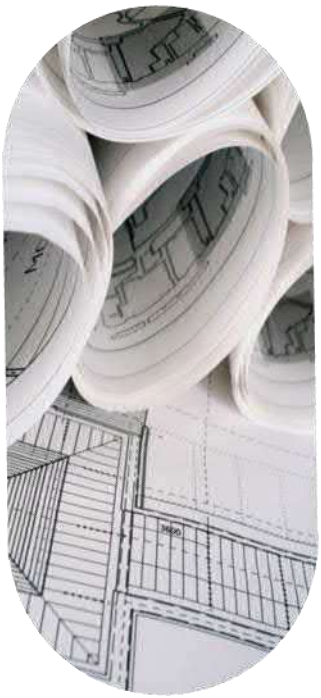
Representations

Medway Local Plan 2022-2040
Regulation 18 Consultation –
Setting the Direction for Medway 2040

Catesby Estates

October 2023



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1. The following representations are made in response to Medway Council's (the "Council") Local Plan 2040 (LP2040) Regulation 18 Consultation – Setting the Direction for Medway 2040 (September 2023) on behalf of Catesby Estates, in respect of its land interests at Allhallows, Rochester, Medway.

2. These representations should be read alongside the following supporting document:

    a. Catesby Estates – Allhallows Vision Document

3. The Council has not proposed specific questions as part of this consultation, therefore Marrons' response follows the chapters within the LP2040 and makes comments where appropriate.

Chapter 1 – Introduction

4. The LP2040 states within the introduction that this consultation does not detail policies or identify those sites preferred for new development. Catesby Estates supports the approach the Council has taken in looking at the needs of Medway holistically, given the unique context of the area. In planning for development to 2040 it is important to consider proportionality and deliverability across the plan period. Consequently, as commented on in more detail later in these representations, Catesby Estates considers that the most suitable approach is one which delivers housing and prosperity via a range of options.

Chapter 2 – Context

5. The LP2040 notes that Medway is a complex place, with distinct towns and villages that have strong identities and heritage, but looks to the future with innovation and enterprise. Catesby Estates considers that any strategic plan for the region should therefore consider how the region can be developed to encourage and sustain Medway's growth to 2040. It is therefore encouraging that the LP2040 also states that people will be at the centre of the Plan and it will consider the diverse communities who make up Medway. Catesby Estates also supports the notion in the LP2040 that "housing-led growth can support wider investment in services and businesses and contribute to shaping the character of new and existing communities" (paragraph 2.7).

6. Catesby Estates agrees with the Council's assertion that the LP2040 can help Medway 'capitalise on its strategic advantages for businesses, with transport links, proximity to London, the cluster of universities and colleges, and a diverse portfolio of employment plan' (paragraph 2.8). There are clearly opportunities to attract more businesses to set up locally and re-balance the commuting patterns, something the LP2040 notes as being 'central to Medway's economic strategy' (paragraph 2.8). This can be achieved by creating vibrant and well-connected communities with a range of uses and a choice of homes.

7. Notably, as the LP2040 comments, Government funding has been withdrawn from the Housing Infrastructure Fund (HIF) for strategic transport and environmental schemes. The HIF programme was central to the delivery of key infrastructure ahead of growth coming forwards and it is acknowledged that there are pressures on the existing infrastructure. Catesby Estates considers that development can help fund key infrastructure improvements, that benefit existing communities and help Medway implement its economic strategy. Notwithstanding, the delivery of infrastructure improvements must be sustainable in order to keep pace with growth and Catesby Estates suggests this is best achieved by a balanced approach across Medway, rather than in one focus area.

Chapter 3 – Vision for Medway in 2040

8. Catesby Estates supports the vision outlined within the LP2040, particularly where it references the unique characters that contribute to the areas identify, involving coastal, countryside and urban locations. It is important that all areas of Medway enjoy the planned growth available via the LP2040 and the associated benefits it can bring.

Chapter 4 – Strategic objectives

'Prepared for a sustainable and green future'

9. Catesby Estates supports the need to plan for a sustainable and green future, however, this must be done in a way which is viable so that development is not stifled and the associated benefits realised more quickly. In order to ensure transparency, it

is vital that Government policies and agendas are built into the Plan, rather than bespoke strategies which may be harder to implement and/or govern.

10. Catesby Estates is also supportive of the Council's aspirations for green growth, particularly in terms of securing 'a robust green and blue infrastructure network', and considers that this should be inclusive of delivering the new homes required, rather than seen as competing issues. By way of example, expanding Allhallows will allow the sensitive delivery of homes where they are needed, whilst investing in the protection and enhancement of valued environmental assets. This should be embraced and incorporated within well designed development, rather than seen as a constraint to development at locations where sustainable development is possible. 'The Concept' shown on page 6 of the accompanying Vision Document demonstrates how this might be possible with the Site.

'Supporting people to lead healthy lives and strengthening our communities'

11. Catesby Estates supports the need for high quality housing and for a choice of housing that meets the needs of the local communities. Notwithstanding, any associated policies must be evidenced robustly to ensure they are a true reflection of local need. Communities need to grow in order to maintain services. Development in Allhallows presents an opportunity to deliver homes and services which will contribute to strengthening the existing community, as well as providing homes in an area identified for significant employment growth.

12. Catesby Estates also supports the reduction in inequalities related to health and considers that well planned rural homes can offer good access to green and blue infrastructure, which the LP2040 is also focussed on, that will in turn also support the development and retention of local services.

'Securing jobs and developing skills for a competitive economy'

13. Catesby Estates agrees that a pillar of the LP2040 will centre on boosting the local economy and attracting inward investment through a choice of quality employment land that meets the needs of businesses. It is also considered however that a choice of homes that meets the needs of current and future residents will support the desired increase in the local economy and assist in Medway becoming an attractive place to

live and work. Development in Allhallows will allow a rural choice of homes within an existing settlement that is well positioned to sustain future growth, given it lies within close proximity to the Isle of Grain and Kingsnorth; two of the largest existing employment opportunity areas in Medway. The expansion of Allhallows will not only enable the services and facilities within that settlement to thrive and improve, but also provide increased choice to local people to remain in the area and encourage the live-work model that the LP2040 is striving to achieve.

'Boost pride in Medway through quality and resilient development'

14. The LP2040 focusses on the need for the provision of good quality infrastructure, sustainable development and making the best use of brownfield land. Catesby Estates considers that Medway has big ambitions and in order to achieve these it is vital that growth is planned and implementable. In order to deliver the desired connectivity, choice of economic land, choice of new homes, promote inward investment and cater to the needs of the existing communities, a holistic approach is required that looks towards connecting and supporting the whole region.

Chapter 5 – Developing a Spatial Strategy

'Development needs'

15. Catesby Estates agrees that a 'Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities' (paragraph 5.2). Alongside this Catesby Estates supports the Council's growth ambitions and advocates an unconstrained and holistic view of development across Medway, in order to achieve this.

16. The LP2040 correctly identifies that the Government directs Local Planning Authorities to use its Standard Method when determining the scale of housing required over the plan period. As the LP2040 sets out the standard method identifies a minimum need of 28,500 homes over the plan period to 2040 (1,667 dpa). The LP2040 further states that this is higher than the rates of housing building seen in Medway for 30 years (paragraph 5.3). Catesby Estates is clear that Government policy should be followed when preparing a Local Plan to ensure it is positively prepared, compliant with national policy and thus able to be found sound. At the time

of writing it remains that the Standard Method is the starting point for calculating the minimum housing need and it is this calculation that the Council should therefore use when preparing the Plan.

17. Moreover, as the Planning Practice Guidance (PPG) refers, unconstrained housing need could exceed the standard method minimum:

> *'The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies,* ***changing economic circumstances*** *or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates…*
>
> *…Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need* ***are likely to exceed past trends*** *because of:*
>
> - ***growth strategies*** *for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
>
> ***strategic infrastructure*** *improvements that are likely to drive an increase in the homes needed locally;…'* (our emphasis)
>
> (Paragraph: 010 Reference ID: 2a-010-20201216)

18. Catesby Estates therefore considers it counter-productive, given the Council's own vision and strategic objectives which seek to transform the economic performance and prosperity of Medway, to immediately limit housing needs based on past trends – clearly the future of Medway cannot be assessed on past trends given the ambition of the Council and LP2040 into the future: to exceed the past delivery and economic performance of Medway.

19. Whilst Catesby Estates recognises the concerns of the Council regarding existing infrastructure and future capacities, the preparation of a Local Plan is the correct tool with which to address these issues. It is vital therefore that the LP2040 plans for the

correct level of development, in particular housing, so the correct level of supporting infrastructure can be planned alongside.

20. Notwithstanding the above comments, Catesby Estates also notes the request from Gravesham Borough Council to provide an additional 2,000 homes to help it meets its needs. This further increases the requirement within Medway and highlights the need to plan for housing that can be delivered at all stages of the plan period.

21. Paragraph 5.12 of the LP2040 states the housing needs for Medway over the plan period pf 2022-2040 to be 28,339. Paragraph 5.3 and 5.11 subsequently note the need to be 28,500. Furthermore, paragraph 5.3 also refers to the need as 1,667 homes a year, which when taken across the 18 year plan period (2022-2040), results in a total need of 30,006 homes. With three different figures in the LP2040, it is imperative the Council are clear on the housing needs of Medway and if it has applied any reductions to the standard method figure. Notably however, a buffer will need to be applied to the correct figure as the Council confirms at paragraph 5.12 and Gravesham's unmet need will also need to be accounted for. Catesby Estates therefore considers that the plan period need for Medway will be closer to 34,000 homes (1,888 dpa).

22. At Figure 2 of the LP2040 the Council sets out how many sites are considered to be in the pipeline (with planning permission), those it expects to come forward as windfall sites and thus the remainder it will need to allocate within the LP2040 in order to meet its needs.

23. Regarding pipeline sites, Catesby Estates notes this figure to be 7,583, which is 27% of the need across the plan period (using the Council's figure of 28,500). This is considered significant and the Council should assess these sites to ensure they are deliverable before relying on them in a new Plan. Any planning permissions which have lapsed should indicate that a Site is not coming forward in the short term.

24. Regarding windfall sites, Catesby Estates notes this figure to be 3,000, which is 10.5% of the need across the plan period (using the Council's figure of 28,500). The National Planning Policy Framework 2023 (NPPF) is clear that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling

evidence that they will provide a reliable source of supply (Paragraph 71). Catesby Estates therefore requests that the Council provide robust evidence that demonstrates 3,000 homes are capable of being delivered via windfall sites across the plan period.

25. Regarding the number of homes needing to be allocated within the LP2040, it is noted that this is likely to rise following the correct calculation of need across the plan period. Nevertheless, Catesby Estates suggests the Council should consider allocating more sites within the LP2040 in order to require less unplanned development to meet its needs across the plan period.

26. Paragraph 5.15 of the LP2040 notes that the Land Availability Assessment (LAA) has revealed land with a potential capacity for circa 38,200. Catesby Estates suggests that sites contained within the LAA are therefore assessed robustly and objectively to enable the Council to plan and allocate sites for the majority of its housing need.

27. Table 1 of the LP2040 demonstrates the potential housing capacity for each of the category areas, according to the LAA. It shows that a potential capacity of 11,151 homes exists within urban areas, which is considered a high level of growth. Catesby Estates considers that caution should be applied when considering whether this this level of urban growth is feasible, and whether it will deliver the right choice of homes. Complexities exist with urban redevelopment that often impact the speed and viability of delivery. In addition, such development also delivers a greater proportion of smaller sized units and the Council need to consider this carefully against the aim of the LP2040 and needs of the existing a future population of Medway.

28. Table 1 of the LP2040 also confirms that circa 40% of the potential sites fall within the rural development areas of Medway. This reflects a need for the Council to consider its growth locations and corridors holistically and not miss opportunities to allocate sites that would contribute to the vision for Medway, and provide links to different areas. The expansion of existing settlements such as Allhallows can deliver family homes with policy compliant affordable housing. Any environmental impacts can be mitigated through careful layout and design that ensures future development respects and enhances its surrounding context.

29. Paragraph 5.36 of the LP2040 discusses sites with the potential for development in the rural areas and focusses heavily on those sites put forward on the Hoo Peninsula. The LP2040 does not discuss other rural areas where sites have been put forward such as Allhallows – at this stage the LP2040 should be considering all options and assessing them against the vision for Medway. Whilst it is noted that the Hoo Peninsula can accommodate some new development, it is a notable constraint that HIF funding has been removed, and the Council comments at paragraph 5.45 that the capacity of infrastructure to support major growth on the Hoo Peninsula is a strategic consideration.

30. Notwithstanding, Catesby Estates considers that Allhallows forms part of the wider area which the Council has spent much time developing proposals for and therefore complements the development prospects on the Hoo Peninsula when viewed holistically, particularly those related to industry. Indeed, Catesby Estates recognises that such urban growth may take a long time to come to fruition, as seen elsewhere in the country with strategic development locations. Consequently, Allhallows represents an opportunity for early delivery without the need for significant infrastructure, within a wider area which has long term growth potential, helping achieve the desired long term aim of increased prosperity in the region, alongside maintaining an annual supply of homes.

Land at Allhallows, Rochester, Medway

31. Catesby Estates is promoting Land at Allhallows, Rochester, Medway ("the Site") for residential-led development through the LP2040. The Site is identified in the Council's LAA as one of the sites put forward within the 'rural areas'. The enclosed Site Location Plan details the extent of the Site and a Vision Document providing more detail regarding its context, opportunities and constraints, and development potential is also enclosed with these representations.

32. The Site directly adjoins Allhallows' southern and eastern boundaries and has the opportunity to deliver new homes and facilities to support the growth and function of Allhallows as a self-sufficient and sustainable year-round community, alongside supporting nearby employment growth at Hoo St Werburgh, Grain and Kingsnorth.

The Site has the capacity to accommodate circa 350 new homes, via a landscape-led development approach.

33. Figure 3 within the accompanying Vision Document details the Site's immediate context, opportunities and constraints. It also demonstrates the significant caravan/holiday park accommodation that is located within Allhallows, which is considered an issue for its year-round vitality and social prosperity. Given the vision of the LP2040 is to boost economic activity and promote inward commuting patterns, existing settlements such as Allhallows have the opportunity to accommodate new sustainable growth that will benefit existing residents, helping to spread the vision across Medway. Moreover, Allhallows already has key infrastructure such as a primary school, community facilities and a GP surgery, therefore the proposed development will help complement the existing services and facilities, making Allhallows a more sustainable community.

34. Figure 7 within the accompanying Vision Document demonstrates the emerging context of Medway following the publication of the LP2040 consultation. Hoo St Werburgh and the Hoo Peninsula are key areas for Medway, alongside the areas of planned employment growth at Kingsnorth and Isle of Grain. Allhallows is situated on the northern coastline, approximately equidistant from Kingsnorth and Isle of Grain. The Site's location therefore provides a choice of new homes within a commuting distance of two planned employment growth areas, helping link up existing communities with future economic prosperity.

35. These new homes and year-round population will assist in sustaining the existing services and facilities within Allhallows, as well as supporting enhancements in the range of local services and facilities and therefore the general future sustainability of the settlement. It should be noted that enhanced services and facilities are likely to boost the seasonal population of the holiday parks and lead in to an increase in tourism trade for Allhallows and the surrounding areas.

36. In addition, Investment in on-demand public transport links between Allhallows, the Isle of Grain, Kingsnorth and importantly Strood (for train links and secondary education facilities) will all be explored as part of the development proposals to further reinforce the sustainability and connectivity of Allhallows within the Hoo Peninsular.

37. The Site is considered to support the Councils four strategic objectives set out within the LP2040, as detailed on pages 12 and 13 of the accompanying Vision Document, but in particular support for development on the Hoo Peninsula and at Allhallows.

38. Marrons and our client Catesby Estates would be pleased to discuss the Site and its development potential further with the Council, as appropriate.

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Date: 31 October 2023
Our ref: 67597/01/SSL/SFu/27138490v1

Dear Sir/Madam

Representations on behalf of Redrow Homes, Land to the west of Pump Lane, Rainham to Medway Local Plan Regulation 18 Consultation – Setting the Direction for Medway 2040, September 2023

On behalf of our client, Redrow Homes, we write to provide formal representations to the above consultation into the emerging Medway Local Plan, which runs until 31 October 2023. For completeness, a copy of these representations without the attachments, has also been submitted via Medway's online consultation form.

Redrow has an interest in c. 24Ha of land to the west of Pump Lane, Rainham (RN9) as shown on the Plan at Annex 1.

The site is identified in the Medway Strategic Land Availability Assessment (SLAA) (2023) as Site RN9, but is shown as 'availability unknown'. The site is also identified in the SLAA as a site that could move forward to Stage 2 Assessment. In the Regulation 18 Local Plan the site and surroundings is identified as potential 'suburban expansion sites'.

These representations are submitted to support the promotion of this suitable, available and achievable site through the Local Plan for an allocation as well as respond to the Regulation 18 consultation document.

Representations

Vision

Redrow, who has an interest in land to the west of Pump Lane, Rainham (RN9), fully support the Vision and recognise that the countryside, coast and the urban open spaces are valued and benefit as joined up environmental assets in a resilient green infrastructure network. Important wildlife and heritage assets are protected and enhanced. Medway has transitioned to a low carbon economy, with a clear path mapped out to reaching 'net zero'. Development brought forward by Redrow, on a series of sites, can contribute to the Vision.

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It is considered that green growth can and should be supported across the Borough and this should be inclusive of delivering the new homes required. Redrow believe that suburban expansion at Rainham is one way to sensitively deliver homes where they are needed, whilst still protecting and enhancing valued heritage and environmental assets. These should be embraced and incorporated within well designed development, rather than being seen or used as constraints to development at locations where development could be sustainable.

Redrow support the scope for improved travel choices and infrastructure that can reduce use of the private car across Medway, with people benefitting from better provision for pedestrians and cyclists, and a greater public transport offer. This has already transformed how people move through the central urban areas and strengthened the connections with wider neighbourhoods and villages and, looking forward, will be means to mitigate and alleviate against existing highway capacity constraints.

These transport initiatives can and should be incorporated into new development on the edges of the suburban areas, such as at Rainham, to deliver the growth required in a sustainable way and the Local Plan is the way to achieve that. This may include wider strategic planning and masterplanning to enable an integrated approach across a range of sites located at the edge of the main suburban area. While some sites could come forward on their own, such masterplanning could look to integrate and co-ordinate the delivery of wider transport initiatives, together with the provision of social infrastructure and green infrastructure required, while enhancing local heritage and landscape assets.

Strategic Objectives

As stated above, Redrow support the objective to strengthen and develop transport networks to provide safe and effective choices for sustainable travel, including improved opportunities for walking and cycling and enhanced public transport services, and management of the highways network, with associated improvements in air quality. This is seen as key to unlocking development potential at sites where, historically, highway capacity has been seen as a constraint.

Further, Redrow recognise the need to secure a robust green and blue infrastructure network across land and water that protects and enhances the assets of the natural and historic environments in urban and rural Medway; providing resilience for nature through better connectivity and conditions; informing the design and sustainability of new development; and supporting healthier lifestyles.

These can readily be incorporated into development proposals and it is considered that these can best be planned in co-ordination with a growth strategy to deliver the new homes required at the appropriate location. The Local Plan could set out a clear strategy for achieving these objectives within individual site allocations but also across a wider area, such as suburban expansion at Rainham, through masterplanning and co-ordination of development proposals (a Framework).

New housing growth in selected areas can also achieve the objective to reduce inequalities in health by delivering better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm design for walking, cycling, parks and other recreation facilities.

Well designed and co-ordinated new housing growth at the right suburban locations could reduce social isolation by supporting retention and enhancement of local services close to where people live, and inclusive environments that are accessible by all groups in society. It could also strengthen the role of

Medway's existing urban, neighbourhood and village centres, responding with a positive strategy to changes in retail; supporting independent retail and start-ups, encouraging new business uses into the High Street. It would help to secure a range of accessible services and facilities for local communities close to where they live.

As set out above, Redrow support the objective to boost pride in Medway through quality and resilient development, and this could be achieved with development that is supported by and co-ordinated with the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served. As such, it is critical to deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most accessible locations, which should include suburban extensions, to best enhance Medway's existing economic, social and environmental characteristics.

Spatial Strategy

Redrow would strongly encourage Medway to prepare a Local Plan that seeks to deliver the homes required, as derived by the standard method. As indicated in the Regulation 18 draft Local Plan, the Government considers that this method is appropriate to meet its housebuilding ambitions to tackle pressures in the housing market and there is a housing crisis, particularly regarding affordability. There is an absolute need to deliver the homes required when and where they are needed to meet Medway's growing needs and the requirements for those desperately needing a good quality home. The Local Plan must set out a strategy to achieve this. This requires a wide range of sustainable housing allocations at different scales and locations that can be delivered at different rates and times.

Redrow would agree that consideration should be given to potential impacts on the environment and strategic infrastructure needs. However, these should not simply be seen as a constraint to new housing growth as the focus should be to assess how negative impacts could be avoided, or mitigated, such as through the co-ordinated delivery of new services and enhancements to landscapes, heritage and biodiversity.

Urban sites will have an important role to play, but they are not always available and will often deliver the smaller homes (1 and 2 bed flats), with less affordable housing as demolition, conversion or land decontamination is often required and, as such, development of such sites tends to have higher costs for these reasons. As the Regulation 18 Plan recognises, this can affect viability and hence the type of development that can be delivered and when it is delivered.

On the other hand, suburban expansion sites are located in close proximity to the urban areas, are usually available and can deliver larger family homes with policy compliant affordable housing. There are potential environmental impacts but this can be mitigated through careful layout and design.

Redrow would agree that development on the green field sites in this category would be expected to be built quicker as the site constraints are more limited than brownfield sites. It is also recognised that development of large sites in this location, or smaller sites that are comprehensively planned, could provide opportunities to enhance sustainable travel options, making it easier and more attractive for people to walk, cycle and use public transport. New housing in these locations could support existing services and facilities and deliver more if required.

It is noted that development to the east of Rainham would erode the strategic gap between Rainham and Newington and add further to the congestion and pollution issues on the A2 and that larger scale development would not be appropriate to the south, around the Capstone Valley as this would potentially adjoin the development of the proposed 'Lidsing Garden Community' in Maidstone. As such, there should be more focus on the potential land to the north of Rainham, with detailed consideration given and discussions held with land owners to identify how potential impacts could be appropriately mitigated and integrated development secured.

Land to west of Pump Lane, Rainham

As stated above, Redrow has an interest in approximately 24Ha of land to the west of Pump Lane, Rainham (SLAA site: RN9).

It is considered that the land has good potential as an accessible, suburban expansion site, to deliver sustainable housing development that would accord with the draft Local Plan's Vision and Objectives. There will be some constraints to development that need to be overcome/mitigated, but that is likely to be the case, in some form or other, across the Medway Council area. In this case, it is considered that these constraints could be appropriately addressed, through well considered proposals and a criteria-based allocations, for the reasons set out below.

A high-level illustrative layout, demonstrating how a scheme could come forward at land to the west of Pump Lane, has been appended to this representation.

Availability

As Redrow have an interest in the land and are promoting the site for residential development on behalf of the landowner, we can confirm that the land is available for early delivery. Redrow would be keen to engage with officers to discuss how this land could deliver new homes in the shorter term, while mitigating environmental and heritage impacts. In the Local Plan, these could be covered by a criteria-based policy linked to an allocation of the land for housing.

Addressing Potential Constraints

Redrow are aware of the appeal decision on this site (ref. APP/A2280/W/20/3259868) - the appeal site measured approximately 50Ha, whereas Redrow's proposed allocation is only half of this, at 24Ha.Redrow are also aware of the concerns raised in the Reg 18 draft Local Plan regarding potential development in this broad area. However, it is considered that a carefully and sensitively design scheme could address the highway capacity issues and the harms identified by the Inspector.

Highway Capacity, Sustainable Transport and Access

The appeal inspector found that the residual cumulative impacts on subnetworks 3 and 7 would not be severe, but that is not the case for subnetwork 2. The residual cumulative impacts on that subnetwork would, in her view, be severe, particularly during both the AM and PM peaks. She recognised that those impacts would be confined largely to the peak hours and that the subnetwork forms only a part of the wider network.

A Transport Technical Note (TTN) has been prepared in support of these representations. The TTN outlines the multi-modal access strategy that could be achieved should a planning application come

forward on this site; considers the accessibility of the site; quantifies the likely vehicular trip generation of the proposed development; and identifies appropriate and proportionate mitigation measures. In doing so, it addresses the reasons for refusal of the previous planning application and appeal concerning the wider landholding of relevance to highways and transportation.

The vehicular trip generation and distribution exercise presented below confirms that the impact of the proposals in this regard would be much-reduced relative to the previous scheme. It is further demonstrated that ongoing shifts in travel behaviour away from traditional peak period commuting, together with both 'soft' and 'hard' travel planning measures and 'decide and provide' mitigation strategies, will ensure that there would be no 'severe' residual highways impacts, in accordance with Paragraph 111 of the National Planning Policy Framework.

The note concludes the site represents a viable and sustainable location for development in transport planning terms and that the highways reasons for refusal of the previous outline planning application can be overcome.

Landscape

The site forms part of the Gillingham Riverside Area of Local Landscape Importance (ALLI). The area is characterised by scattered dwellings/clusters of dwellings, as well as the small hamlet of Lower Twydall, which sits to the west of the site, with the small village of Lower Rainham, which straddles the Lower Rainham Road to the northeast. Both settlements are designated Conservation Areas. Beyond the railway line, to the southwest, is the urban settlement of Twydall/Rainham with shops, services and good public transport links. To the north, east and west, the site is surrounded by agricultural land which extends up to the Medway Estuary. The Medway Landscape Character Assessment (MLCA) recognises that the Lower Rainham Farmland Character Area (LRFCA) identifies the area has value as an extended buffer to the Country Park and protected Estuary coastline, which lie to the north.

The Planning Inspector regarded the change in character as 'distinct and abrupt', as opposed to it being an area of 'transition' between town and country. The Inspector also noted that the development would, as a matter of fact, comprise a 'significant and large scale development'. As such, she was of the view that the development proposed would be uncharacteristic and of a significant scale.

However, the Inspector noted that the site is generally well contained by mature vegetation, including woodland and tall hedgerows, limiting available views and extent of visibility. She also noted that the landscape effects would be experienced from a relatively constrained area around the site. It would, therefore, be possible to reduce the impact on the landscape with a less significant scheme for the site, that was designed to be more transitional - with pockets of development with an enhanced framework of landscaped breaks and buffers. A landscape led proposal (as shown on the attached plan appended to this representation) for the site could provide an attractive setting to the Lower Rainham and Lower Twydall Conservation Areas, with attractive views from the river and railway, forming a green backdrop in views from the Estuary.

Pump Lane

As an additional concern, the Inspector noted is that Pump Lane is an unlit, narrow, sometimes single-track country lane with no footways. Towards its northern end, it is fronted on one side by a small group of dwellings, but for the most part, it is lined along both sides with mature hedges/hedgebanks. She added that it is identified as a rural lane by policy BNE47 which, among other things, seeks to protect the landscape value of such lanes.

The Inspector went on to note that, for the appeal proposal, four new junctions were proposed on Pump Lane to facilitate its crossing by the proposed estate loop road and, in total, the new junctions on Pump Lane would require the removal of around 175m of hedgerow. The layout of the southern junctions would require any replacement planting to be set back significantly to allow for forward visibility and, at that point, the lane would cease to be narrow and it would no longer be enclosed by hedgerows. She therefore concluded that the highway would have the character and appearance of a residential access road, as opposed to a rural country lane.

However, on review of access proposals to the land, it is considered that there only needs to be a relatively small incursion on Pump Lane, at the southern end, to allow for emergency access, pedestrians and cycles to access the facilities to the south of the railway line. As such, that should not be a constraint to development and should be regarded as a benefit.

Heritage

The Inspector considered the extent of the development proposed would effectively subsume the village of Lower Rainham, and its Conservation Area, into the extended urban area of Twydall/Rainham, with the consequence that it would lose its separate identity and character as a rural village.

The Inspector found that there would be harm towards the middle of the less than substantial range to the special interest and significance of the grade II listed Chapel House, and to the heritage significance of Lower Rainham Conservation Area, with harm identified to other of the designated assets to be at the lower end of the scale. Any harm to the significance of the non-designated Bloors Oasts would be very minor.

Overall, the Inspector concluded that the very substantial benefits that would arise from the appeal scheme, primarily the delivery of much needed new homes, to be sufficient to outweigh the heritage harm identified both individually and collectively. A smaller, well design scheme could avoid any heritage harm.

Conclusion

Overall, it is proposed that a high quality, sustainable housing scheme, delivering policy compliant affordable and family housing to meet short term needs, that would meet the Vision and Objectives for the Local Plan could be achieved on land to the west of Pump Lane, Rainham.

We trust that these representations will assist in ensuring sustainable and deliverable development within Medway to help meet the Council's vision and strategic objectives as set out in the Regulation 18 Local Plan.

Please contact us if you have any questions regarding these representations. Redrow would welcome the opportunity to take place in the forthcoming developer interviews to provide more information regarding this site to support the Council in developing the Local Plan.

Yours faithfully

[redacted]

Simon Slatford
Senior Director
BA (Hons) BPI MRTPI

Enclosures Annex 1 - Initial Illustrative Layout Plan, prepared by Redrow
Annex 2 - Highways Technical Note, prepared by DHA

LICHFIELDS

Annex 1: Initial Illustrative Layout Plan, prepared by Redrow

Noise Constraint (train)

Key Views in/Out

Secondary access

Listed Building Buffer

Informal footpath

Development Area

Primary Access

Existing Trees

Proposed Trees

SUDS

Proposed Landscape Enhancement

Area allowed for BNG, POS, SUDS & Landscape buffering: 50% Total Site Area

Land to the West of Pump Lane
Illustrative Masterplan

0 25 50 100

1:1250@A0

REDROW

LICHFIELDS

Annex 2: Highways Technical Note, prepared by DHA

TRANSPORT TECHNICAL NOTE

JOB REF.
PL/AH/32275

CLIENT
Redrow Homes

SITE
Land west of Pump Lane, Rainham, Medway

1.1 INTRODUCTION

1.1.1 This Transport Technical Note (TTN) has been prepared in support of representations by Redrow Homes to the Medway Local Plan 2040 Regulation 18 consultation in relation to Land west of Pump Lane, in Rainham, which is being promoted for residential development comprising c.350-400 dwellings.

1.1.2 This TTN outlines the multi-modal access strategy that could be achieved should a planning application come forward; considers the accessibility of the site; quantifies the likely vehicular trip generation of the proposed development; and identifies appropriate and proportionate mitigation measures. In doing so, it addresses the reasons for refusal of the previous planning application and appeal concerning the wider landholding of relevance to highways and transportation.

1.1.3 The vehicular trip generation and distribution exercise presented below confirms that the impact of the proposals in this regard would be much-reduced relative to the previous scheme. It is further demonstrated that ongoing shifts in travel behaviour away from traditional peak period commuting, together with both 'soft' and 'hard' travel planning measures and 'decide and provide' mitigation strategies, will ensure that there would be no 'severe' residual highways impacts, in accordance with Paragraph 111 of the National Planning Policy Framework.

1.2 PROPOSAL SITE

1.2.1 The site is located to the south of Lower Rainham Road and to the west of Pump Lane, approximately 2km north-west of Rainham and 3.5km east of Gillingham town centres. The location of the site within a local context is shown in Figure 1 overleaf.

FIGURE 1: SITE LOCATION WITHIN LOCAL CONTEXT (COURTESY OF GOOGLE MAPS)

1.2.2 The site currently comprises of agricultural land, including an existing cold store and temporary worker accommodation which would be removed as part of the proposals.

1.2.3 The site is bound to the north by Lower Rainham Road and further agricultural land, to the east by Pump Lane, to the south by Pump Lane and the North Kent railway line and to the west by the aforementioned railway line and further agricultural land.

1.3 PEDESTRIAN AND CYCLE CONNECTIVITY

1.3.1 A footway measuring approximately 2.0m in width is currently provided on the northern side of Lower Rainham Road in the site vicinity. A second footway measuring approximately 1.0m is also present on the southern side of the road along the site frontage. These footways are subject to street lighting to aid pedestrian movements during the hours of darkness.

1.3.2 As set out in detail below, the primary site access from Lower Rainham Road would incorporate an uncontrolled crossing, which would enable pedestrians and cyclists to access the bus stops to the west of the site and Byway GB2, which routes north towards Riverside Country Park and National Cycle Route 1.

1.3.3 Consistent with the previous outline application (Planning Reference: MC/19/1566), it is proposed to narrow Pump Lane to 3.7m under the railway bridge to the south of the site in order to form a 1.2m width footway link between the

secondary site access and Tywdall, where local facilities and frequent bus services can be accessed. This narrowing would take the form of a signalised shuttle working feature, which would further dissuade 'rat-run' movements on Pump Lane and act as a valuable traffic calming feature.

1.3.4 The scheme would include the widening of Pump Lane immediately to the north of the railway bridge to 6.0m to ensure adequate width for two vehicles to pass. The proposed design can achieve 65m intervisibility between the signal stop lines, which is deemed adequate based on the recorded vehicle speeds on Pump Lane. Please note that an ATC was completed for a week-long period commencing 13th October in the location of the proposed access and this recorded 85th percentile speeds of 28mph. The full ATC data is included at **Appendix A**.

1.3.5 It is noted that the shuttle working scheme proposed as part of the previous outline application was regarded as a benefit by the Inspector and the Secretary of State.

1.3.6 There are also a number of Public Rights of Way (PRoW) in close proximity to the site, as shown in Figure 2 below. Green lines indicate Bridleways, red lines indicate Byways, purple lines indicated Footpaths and blue lines indicate Restricted Byways.

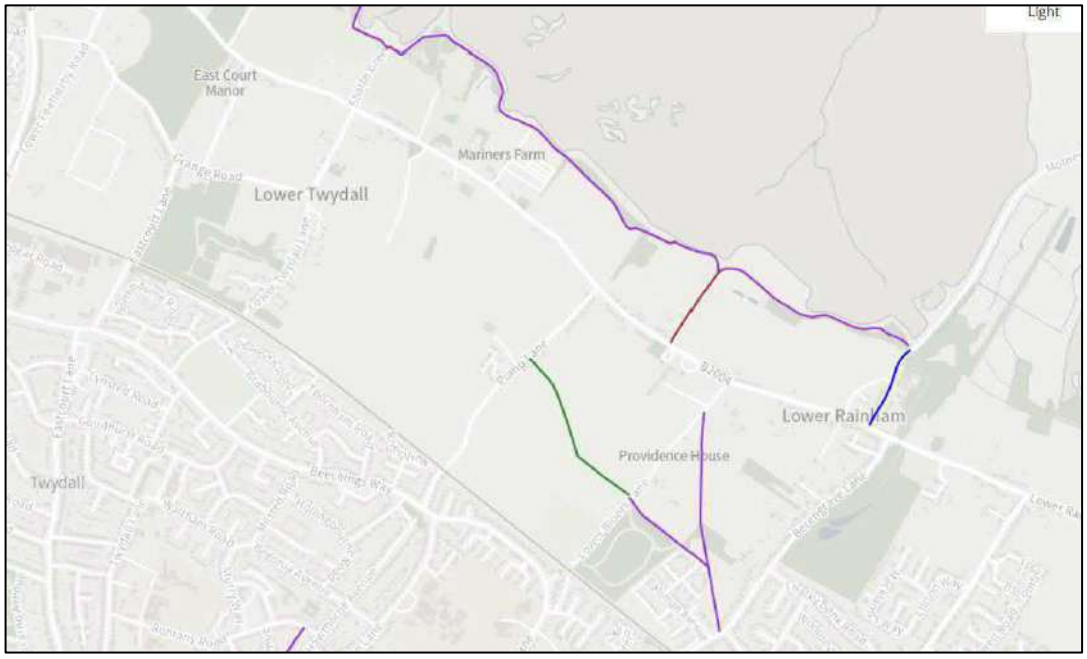


FIGURE 2: LOCAL PROW NETWORK (COURTESY OF MEDWAY COUNCIL)

1.3.7 It is noted that a Bridleway (GB6A) is located to the east of the site, which provides a route towards Rainham town centre and railway station. These destinations can be accessed within a 29-minute walk or 8-minute cycle time of both proposed site accesses.

1.3.8 With respect to cycle infrastructure, it is reiterated that National Cycle Route 1 (NCR1) can be accessed to the north of the site within Riverside Country Park, as shown in Figure 3 below. There are also a number of local cycle routes along the A2 and also on Ito Way and Yokosuka Way.

FIGURE 3: LOCAL CYCLE NETWORK (COURTESY OF OPENCYCLEMAP.ORG)

1.3.9 NCR1 links the site with Rainham to the east and Gillingham, Chatham and Rochester to the west. As part of any forthcoming planning application, the opportunity to upgrade Byway GB2 to facilitate direct cycle access between the site and NCR1 would be explored, including widening and surfacing.

1.3.10 An isochrone plan has been prepared illustrating the areas that can be accessed within a 5-, 10- and 20-minute cycle time of the site and is included at **Appendix B**. This demonstrates that Lower Twydall and Lower Rainham can be accessed within a 5-minute cycle time, Twydall, Rainham town centre and also the retail and business parks to the south west of the site within a 10-minute cycle time and Gillingham town centre, Upchurch and Hempstead within a 20-minute cycle time.

1.4 PUBLIC TRANSPORT CONNECTIVITY

1.4.1 The nearest bus stops to the site are currently located approximately 300m (or a 4-minute walk) to the west of the proposed primary vehicular access on Lower Rainham Road. Both these stops are provided with flag and posts and a bus cage and are served by Route 131.

1.4.2 A number of further bus stops are located on Beechings Way to the south of the site; the closest of which is situated approximately 325m (or a 4-minute walk) from the proposed secondary site access on Pump Lane.

1.4.3 A summary of the bus services accessible from Beechings Way is provided in Table 1 below.

SERVICE NO.	ROUTE	WEEKDAY FREQUENCY
101 Sapphire	Maidstone - Gillingham	3-5 per hour
116	Chatham - Hempstead	1-2 per hour
130	Twydall - Maidstone	4 per day
182	Chatham - Twydall	3-5 per hour

TABLE 1: LOCAL BUS ROUTES AND FREQUENCIES

1.4.4 It is noted that the bus stops on Beechings Way provide access to high-frequency services throughout the Medway Towns, which operate seven-days-a-week. The potential to upgrade the existing service on Lower Rainham Road and/or to provide a new or enhanced service via the site itself would nevertheless be explored as part of any forthcoming planning application. It is noted in this regard that bus service improvement contributions were proposed as part of the previous outline planning application and were deemed to be a benefit by the Inspector and Secretary of State.

1.4.5 Rainham Railway Station is located approximately 2.5km (a 29-minute walk or 8-minute cycle) to the south-east of the site and provides access to frequent train services to London, Rochester, Chatham, Gillingham, Sittingbourne, Faversham, Canterbury West and Kent coast destinations throughout the week. The station is provided with 28 sheltered cycle parking spaces and ten cycle lockers.

1.5 ACCESS TO SERVICES

1.5.1 The proposed improvements to pedestrian and cycle links would aid the sustainability of the site in transport terms, with range of everyday services and facilities available within Twydall to the south, which could be accessed via the aforementioned pedestrian link via Pump Lane. These facilities include a café, takeaways, local convenience stores, a primary school, doctors surgery, pharmacy and post office.

1.5.2 An isochrone plan illustrating the services accessible within a five-, ten- and twenty-minute walking time of the proposed site accesses is included at **Appendix C**.

1.6 DEVELOPMENT PROPOSALS

1.6.1 It is proposed that the site could accommodate a scheme of approximately 350-400 residential dwellings, together with associated access, landscaping and open space. The indicative site layout plan is included at **Appendix D.** The location of the proposed access can be seen in Figure 4 below.

FIGURE 4: PROPOSED SITE ACCESS LOCATION

1.6.2 It is proposed that principal vehicular access to the site would be achieved from Lower Rainham Road to the north. This would take the form of a priority junction with a ghost right turn lane measuring approximately 35m in length. A feasibility access design is included at **Appendix E**. The proposed site access road would have a carriageway width of 6.75m, as required by the Kent Design Guide for a Local Distributor Road serving in excess of 300 dwellings.

1.6.3 The proposed access design includes a pedestrian refuge island immediately to the east of the site access, equipped with dropped kerbs and tactile paving, which would provide access to the eastbound bus stop in the vicinity as well as Riverside Country Park.

1.6.4 It is noted that Lower Rainham Road is subject to a 40mph speed limit in the site vicinity, which reduces to 30mph along the site frontage and to the east. Based

on the applicable Design Manual for Roads and Bridges (DMRB) guidance for a 40mph design speed, visibility splays of 2.4 x 120m would be required from a new access in this location. The feasibility access design demonstrates that these splays can be achieved within land under the control of the site promoter and the Local Highway Authority.

1.6.5 It is anticipated that the primary access road would route south from Lower Rainham Road, connecting with minor access roads to development parcels to the east and west. Within the southern part of the site, the primary access road would route west to further development parcels and east to a secondary/emergency access from Pump Lane, which would serve a limited number of dwellings and potentially also buses.

1.6.6 The access from Pump Lane would be configured such that the site access would take priority over Pump Lane (north), thereby reducing traffic impacts on Pump Lane itself. A feasibility design of this access is included at **Appendix F**. The site access would have a carriageway width of 5.5m, which is adequate to serve up to 100 dwellings in line with the Kent Design Guide.

1.6.7 The design and layout of the internal road network would give consideration to Local Transport Note (LTN) 1/20 and Manual for Streets (MfS) guidance with respect to street hierarchy and pedestrian and cycle infrastructure.

1.7 TRIP GENERATION ASSESSMENT

1.7.1 An initial vehicular trip generation assessment has been undertaken based on a review of the national TRICS trip rate database. Consideration has been given to the categories *'03 - Residential / A - Houses Privately Owned' and '03 - Residential / B – Affordable / Local Authority Housing'.* It has been assumed that 70 percent of the dwellings would be privately owned and 30 percent would be affordable, in line with Medway Council's existing policy requirements.

1.7.2 Only survey sites in England, Scotland and Wales have been considered (excluding Greater London), with consideration given to sites in 'Edge of Town' and 'Neighbourhood Centre'. Surveys completed during COVID restrictions have been excluded and the population density criteria refined to reflect the site context.

1.7.3 The resulting average trip rates and associated trip generation forecasts are set out in Table 2 and Table 3 overleaf, with the full TRICS outputs included at **Appendix G**.

	TRICS TRIP RATES (PER UNIT)			TOTAL TRIPS (300 UNITS)		
Period	Arrivals	Departures	Total	Arrivals	Departures	Total
AM Peak (0800-0900)	0.145	0.371	0.516	43.5	111	155
PM Peak (1700-1800)	0.341	0.166	0.507	102	50	152
Daily (0700-1900)	2.222	2.228	4.45	667	668	1335

TABLE 2: TRICS RATES AND TOTAL TRIPS FOR PRIVATE RESIDENTIAL DWELLINGS (300 DWELLINGS)

	TRICS TRIP RATES (PER UNIT)			TOTAL TRIPS (100 UNITS)		
Period	Arrivals	Departures	Total	Arrivals	Departures	Total
AM Peak (0800-0900)	0.108	0.249	0.357	11	25	36
PM Peak (1700-1800)	0.197	0.127	0.324	20	13	32
Daily (0700-1900)	1.651	1.696	3.347	165	170	335

TABLE 3: TRICS RATES AND TOTAL TRIPS FOR AFFORDABLE RESIDENTIAL DWELLINGS (100 DWELLINGS)

1.7.4 The total trip generation forecast is summarised in Table 4 below.

	TOTAL TRIPS (400 UNITS)		
Period	Arrivals	Departures	Total
AM Peak (0800-0900)	54	136	191
PM Peak (1700-1800)	122	63	185
Daily (0700-1900)	832	838	1,670

TABLE 4: TOTAL TRIP GENERATION (400 NO. DWELLINGS)

1.7.5 It is noted that the proposed development could generate up to 191 vehicle trips in the weekday AM peak hour, 185 vehicle trips in the PM peak hour and a total of 1,670 vehicle trips across the 12-hour working day.

1.7.6 It should be noted that the above presents a robust assessment in that it is based on pre-COVID trip rates and therefore does not account for any subsequent travel behaviour changes (e.g. increased flexible and home-based working). These, in combination with the proposed transport strategy for the site, can be expected to achieve a meaningful reduction in vehicular trip generation in practice.

1.8 TRIP DISTRIBUTION AND ASSIGNEMENT

1.8.1 A vehicular trip distribution and assignment exercise has been completed using *"Location of usual residence and place of work by method of travel to work"* data

from the 2011 Census for Middle-Layer Super Output Area (MSOA) 'Medway 023', in which the site is located.

1.8.2 It is noted that whilst equivalent data from the 2021 Census has subsequently been released, this was obtained during the Covid-19 pandemic when travel demand was suppressed. The 2011 data has therefore been used in the interests of robustness.

1.8.3 On this basis, the total vehicular trip generation set out in Table 4 has been distributed and assigned to the local highway network as summarised in Table 5 below.

LINK	TRIP DISTRIBUTION	VEHICLE TRIPS	
		AM Peak Hour	PM Peak Hour
Lower Rainham Road (East)	39%	75	73
Lower Rainham Road (West)	61%	115	112
Pump Lane	28%	53	51
Berengrave Lane	1%	3	3
Station Road	2%	3	3
Otterham Quay Lane (North)	1%	2	2
Otterham Quay Lane (South)	8%	14	14
Yokosuka Way	19%	36	35
Gads Hill	40%	76	73
Continue on Lower Rainham Road	1%	1	1
Beechings Way	0%	0	0
Cornwallis Avenue	2%	5	5
Ito Way	17%	32	31

TABE 5: VEHICLE TRIP DISTRIBUTION

1.8.4 It is noted that the maximum increase at any one junction would be at the A289 Yokosuka Way / Gads Hill / Lower Rainham Road roundabout junction, with the

addition of up to 113 vehicle movements during the weekday AM peak hour and 109 vehicle movements during the PM peak hour. This equates to less than two vehicle movements per minute at these times, which is unlikely to represent a 'severe' residual impact on the operation of the local highway network with reference to Paragraph 111 of the National Planning Policy Framework (NPPF).

1.8.5 It is noted that the previous outline planning application (Reference: MC/19/1566) was forecast to generate approximately 633 vehicle trips in the weekday AM peak hour and 564 in the PM peak hour. This is more than three times that of the current proposal.

1.8.6 As part of any forthcoming planning application a full Transport Assessment (TA) would be prepared, informed by the Medway AIMSUN Model (MAM), which would consider the highway capacity impacts of the proposed development in combination with other local committed and allocated developments on the local and strategic highway networks. Proportionate contributions to off-site highway mitigation measures identified through the Local Plan process would be made where necessary, with an emphasis on highway safety improvements and enhancements to sustainable and active travel infrastructure, in line with Department for Transport Circular 01/2022 and 'decide and provide' principles.

1.9 TRANSPORT STRATEGY

1.9.1 The proposed development would be subject to a comprehensive Travel Plan; a draft of which would accompany a forthcoming planning application. This would give consideration to the ongoing change in travel behaviours which were hastened by the COVID pandemic, as well as potential 'soft' and 'hard' interventions to lock-in this shift away from peak period vehicle use, in accordance with the overarching sustainability objective of the emerging Local Plan. These could include financial incentives to encourage the uptake of walking, cycling, public transport and car clubs, as well as home shopping services, and the implementation of facilities to promote home-based and flexible working patterns. As has been noted, there is also the potential to route a new or enhanced bus service through the site.

1.9.2 The implementation of cycle to work schemes by both employers and local authorities has achieved an increase in the number of people who are opting to cycle either their full commute or part of it. This will be facilitated by the provision of secure cycle storage facilities for every dwelling and enhanced cycle infrastructure both within the site and externally, in support of the emerging Medway Local Cycling and Walking Infrastructure Plan (LCWIP).

1.9.3 The design of the internal site layout is also critical to the uptake of active and sustainable travel modes and to trip internalisation. To this end, the street network will prioritise non-car modes at every opportunity, with wide, direct, landscaped and well surveillanced walking and cycling routes provided along principal route corridors and shared surfaces and 'home zones' within lightly-trafficked areas.

1.9.4 Where the use of a car remains necessary, the increased uptake of electric and low-emission vehicles will progressively reduce their environmental impact, and these will be promoted through the installation of 'active' charging infrastructure for every dwelling. The potential to introduce an on-site car club will also be explored to seek to reduce car ownership and parking demand.

1.10 PLANNING HISTORY

1.10.1 It is noted as context that an outline planning application was previously submitted to Medway Council for 1,250 dwellings, a local centre, a primary school and retirement and care accommodation on the wider landholding (also encompassing land to the east of Pump Lane), which was refused by the Local Planning Authority in June 2020 and dismissed at appeal in September 2021 (Planning Application Reference: MC/19/1566 and Appeal Reference: APP/A2280/W/20/3259868).

1.10.2 Amongst Medway Council's reasons for refusal of the outline planning application were the following concerning highways impacts:-

- *"The applicant has failed to satisfy Highways England that the development will not materially affect the safety, reliability and / or operation of the Strategic Road Network (SRN). This is contrary the tests set out in Department for Transport Circular 2/13 paragraphs 9 & 10 and the NPPF at paragraph 109;*

- *The cumulative impact from the increased additional traffic cannot be accommodated on the highway in terms of overall network capacity without a severe impact. This is contrary to Local Plan policy T1 and the NPPF at paragraph 109;*

- *The cumulative impact from the increased additional traffic from the development is unlikely to be able to create a safe highway environment. This is contrary to Local Plan policy T1 and the NPPF at paragraph 109; and*

- *No assessment nor technical details have been provided regarding the two new access points along Pump Lane to serve the proposed development, therefore it has not been possible to appropriately assess the adequacy of these access points. This is contrary to Policy T1 of the Medway Local Plan 2003 and paragraph 109 of the NPPF."*

1.10.3 Within the Secretary of State's Decision Letter, the following further observations were made:-

- *"For the reasons given at IR12.155-12.160, the Secretary of State agrees with the approach taken by the Inspector, namely that it is appropriate to focus on the areas of greatest potential traffic impact in order to assess the scheme against the relevant policies (IR12.158). The Secretary of State agrees with the Inspector at IR12.161 that the local highway network, including key arterial routes, is already heavily congested, particularly during the AM and PM peaks. He notes that the Appellant has proposed a*

number of mitigation works, identified at IR12.161, as amended during the Inquiry, to which he has given consideration.

- *The Secretary of State notes that there were two competing appraisals before the Inquiry that deal with traffic impacts (IR12.162) and that the results of each assessment are significantly different (IR12.165). For the reasons given at IR12.162-IR12.172 and IR191, the Secretary of State agrees with the Inspector at IR12.191 that in terms of the highway modelling evidence, on balance, the outputs of the Council's more holistic Medway Aimsum Model (MAM) approach (which models the interaction between junctions, links and journey times) are to be preferred over the Appellant's isolated junction modelling approach.*

- *For the reasons given at IR12.173-IR12.178 and at IR12.192 the Secretary of State agrees with the Inspector that the residual cumulative impacts on subnetwork 2 would be severe, particularly during the AM and PM peaks (IR12.192). Like the Inspector, the Secretary of State recognises that those impacts are largely confined to peak hours and that the subnetwork forms only a part of the wider network. However, the Secretary of State also agrees with the Inspector that that does not mean that the impacts cannot be considered as severe in their context (all at IR12.192).*

- *Overall on highway matters, the Secretary of State agrees with the Inspector that the appeal scheme would have a severe residual cumulative impact on the local highway network and that there would be conflict in this regard with Local Plan policy T1 and paragraphs 110 and 111 of the Framework (IR12.192). The Secretary of State considers this harm attracts substantial weight against the appeal scheme.*

- *For the reasons given at IR12.189, he agrees with the Inspector's finding of no harm in terms of highway safety (IR12.190). He further agrees with the Inspector's conclusions at IR12.93."*

1.10.4 The Secretary of State's Decision Letter identified the following highways and transport interventions as planning benefits:-

- *For the reasons given at IR12.205-IR12.206 the Secretary of State agrees with the Inspector at IR12.206 that signalisation of the section of restricted carriageway beneath the railway at the southern end of Pump Lane is a benefit which attracts only limited weight in favour; and*

- *For the reasons given at IR12.207-208, he agrees that opening up pedestrian access to the site from the southern end of Lower Twydall Lane and financial contributions towards bridleway improvements attract limited weight. For the reasons given at IR12.209 he further agrees that the planning obligation which includes a contribution towards interim assistance to support bus service provision is a consideration that attracts moderate weight.*

1.10.5 As part of any forthcoming planning application a full STATS19 assessment of collision data will be undertaken to highlight any safety concerns on the local highway network and where necessary mitigation measures will be considered. It is however noted that the Inspector and Secretary of State concluded that the proposal would have resulted in no harm in terms of highway safety.

1.10.6 It has been demonstrated in this TN that the site represents a viable and sustainable location for development in transport planning terms and that the highways reasons for refusal of the previous outline planning application can be overcome.

1.11 SUMMARY AND CONCLUSION

1.11.1 This Transport Technical Note has been prepared in support of representations by Redrow Homes to the Medway Local Plan 2040 Regulation 19 consultation in relation to Land West of Pump Lane, Rainham, which is being promoted for residential development.

1.11.2 The proposals comprise the development of approximately 350-400 residential dwellings, together with associated access, landscaping and open space.

1.11.3 It is proposed that principal vehicular access to the site will be achieved from Lower Rainham Road to the north. This will take the form a priority junction with a ghost right turn lane.

1.11.4 Secondary/emergency access is proposed from Pump Lane, which would facilitate pedestrian, cycle and potentially also bus service connectivity between the site and Twydall to the south.

1.11.5 The proposals include the provision of a new pedestrian crossing point on Lower Rainham Road to the east of the proposed site access, as well as enhancements to the existing Byway which links the site with Riverside Country Park and National Cycle Route 1 to the north.

1.11.6 A review of the existing local pedestrian, cycle and public transport infrastructure has demonstrated that the site is afforded the opportunity for many everyday journeys to take place by active and sustainable travel modes, with a range of local services and facilities located within a reasonable walking and cycling distance. Enhancements to this infrastructure would be made as part of the proposed development, in support of the emerging Medway Local Cycling and Walking Infrastructure Plan.

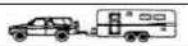
1.11.7 An initial trip generation assessment has been completed for the proposals, which indicates that up to 191 vehicle movements could be generated in the weekday AM peak hour and 185 in the weekday PM peak hour. Across the twelve-hour working day (07:00-19:00), approximately 139 vehicle movements per hour are forecast.

1.11.8 These vehicle trips have been distributed and assigned to the local highway network 2011 Census data, which demonstrates that they would readily dissipate away from the site.

1.11.9 As part of any forthcoming planning application, a full Transport Assessment would be prepared, which would consider the highway capacity impacts of the proposed development in combination with other local committed and allocated developments on the local and strategic highway networks. Proportionate contributions to off-site highway mitigation measures identified through the Local Plan process would be made where necessary, with an emphasis on highway safety improvements and enhancements to sustainable and active travel infrastructure.

1.11.10 In summary, it has been demonstrated that the site represents a viable and sustainable location for development in transport planning terms and that the highways reasons for refusal of the previous outline planning application can be overcome.

APPENDIX
A

Class		Axles	Groups	Description	Parameters	Dominant Vehicle	Aggregate
1	SV	2	1 OR 2	Short - Car, light Van	d(1)>=1.7m, d(1)<=3.2m & axles=2		Light
2	SVT	3, 4 OR 5	3	Short Towing - Trailer, Caravan, Boat, etc.	groups=3, d(1)>=2.1m, d(1)<=3.2m, d(2)>=2.1m & axles=3,4,5		
3	TB2	2	2	Two axle truck or Bus	d(1)>3.2m & axles=2		Medium
4	TB3	3	2	Three axle truck or Bus	axles=3 & groups=2		
5	T4	>3	2	Four axle truck	axles>3 & groups=2		
6	ART3	3	3	Three axle articulated vehicle or Rigid vehicle and trailer	d(1)>3.2m, axles=3 & groups=3		Heavy
7	ART4	4	>2	Four axle articulated vehicle or Rigid vehicle and trailer	d(2)<2.1m or d(1)<2.1m or d(1)>3.2m axles = 4 & groups>2		
8	ART5	5	>2	Five axle articulated vehicle or Rigid vehicle and trailer	d(2)<2.1m or d(1)<2.1m or d(1)>3.2m axles = 5 & groups>2		
9	ART6	>=6	>2	Six (or more) axle articulated vehicle or Rigid vehicle and trailer	axles=6 & groups>2 or axles>6 & groups=3		
10	BD	>6	4	B-Double or Heavy truck and trailer	groups=4 & axles>6		
11	DRT	>6	5	Double road train or Heavy truck and two trailers	groups=5,6 & axles>6		
12	TRT	>6	>6	Triple road train or Heavy truck and three (or more) trailers	groups>6 & axles>6		
14	M/C	2	1 OR 2	Motorcycle	d(1)>=1.18m, d(1)<=1.7m & axles=2		Light
15	CYCLE	2	1 OR 2	Cycle	d(1)<1.18 & axles=2		

K&MTRAFFIC SURVEYS

SITE: PUMP LANE, RAINHAM LOCATION: ATTACHED TO TELEGRAPH POLE

GRID REFERENCE: 51.375710, 0.596739 DIRECTION: NORTHBOUND SPEED LIMIT: 30

13 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	30.9	-
0100	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	26.1	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	28.8	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	7	6	0	1	0	0	0	0	0	0	0	0	0	0	0	28.9	-
0600	12	10	0	2	0	0	0	0	0	0	0	0	0	0	0	25.2	29.2
0700	25	22	0	3	0	0	0	0	0	0	0	0	0	0	0	25.4	30.4
0800	72	69	0	3	0	0	0	0	0	0	0	0	0	0	0	22.9	26.7
0900	27	24	0	3	0	0	0	0	0	0	0	0	0	0	0	22.2	26.3
1000	30	26	0	4	0	0	0	0	0	0	0	0	0	0	0	24.3	29.1
1100	39	34	0	5	0	0	0	0	0	0	0	0	0	0	0	23.2	27.2
1200	42	39	0	2	0	0	0	0	0	0	0	0	0	1	0	24.7	28.4
1300	44	40	0	3	0	0	0	0	0	0	0	0	0	1	0	23.7	27.4
1400	45	45	0	0	0	0	0	0	0	0	0	0	0	0	0	24.6	27.5
1500	93	85	0	7	0	0	0	0	0	0	0	0	0	0	1	22.8	26.7
1600	63	55	0	8	0	0	0	0	0	0	0	0	0	0	0	24.8	29.3
1700	53	46	0	5	0	0	0	0	0	0	0	0	0	2	0	23.9	28.4
1800	35	30	0	4	0	0	0	0	0	0	0	0	0	1	0	25.1	29.2
1900	33	33	0	0	0	0	0	0	0	0	0	0	0	0	0	24.4	27.7
2000	17	16	0	1	0	0	0	0	0	0	0	0	0	0	0	24.7	28.7
2100	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	26.5	-
2200	14	13	0	0	0	0	0	0	0	0	0	0	0	1	0	25.5	27.9
2300	7	7	0	0	0	0	0	0	0	0	0	0	0	0	0	29.4	-
07-19	**568**	**515**	**0**	**47**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**1**	**23.8**	**27.5**
06-22	**635**	**579**	**0**	**50**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**1**	**23.9**	**27.6**
06-00	**656**	**599**	**0**	**50**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**1**	**24**	**27.7**
00-00	**666**	**608**	**0**	**51**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**1**	**24.1**	**28**

14 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	26.5	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	28.2	-
0600	8	8	0	0	0	0	0	0	0	0	0	0	0	0	0	27.9	-
0700	12	11	0	1	0	0	0	0	0	0	0	0	0	0	0	24.6	29
0800	27	27	0	0	0	0	0	0	0	0	0	0	0	0	0	26.5	30.8
0900	38	34	0	3	0	0	0	0	0	0	0	0	0	0	1	23.9	26.9
1000	52	48	0	4	0	0	0	0	0	0	0	0	0	0	0	23	25.9
1100	62	61	0	1	0	0	0	0	0	0	0	0	0	0	0	24.9	28
1200	49	45	0	2	0	1	0	0	0	0	0	0	0	1	0	24.6	28.4
1300	55	53	0	1	0	0	0	0	0	0	0	0	0	1	0	24.2	28.2
1400	54	49	0	5	0	0	0	0	0	0	0	0	0	0	0	24.6	28.2
1500	41	39	0	2	0	0	0	0	0	0	0	0	0	0	0	24.1	27.4
1600	36	34	0	1	0	0	0	0	0	0	0	0	0	1	0	24.1	27.8
1700	35	32	0	1	0	0	0	0	0	0	0	0	0	0	2	24.2	28.3
1800	36	34	0	2	0	0	0	0	0	0	0	0	0	0	0	24.1	29.3
1900	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	26.1	29.6
2000	9	9	0	0	0	0	0	0	0	0	0	0	0	0	0	26.3	-
2100	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	27	-
2200	7	7	0	0	0	0	0	0	0	0	0	0	0	0	0	26.3	-
2300	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	24.4	-
07-19	**497**	**467**	**0**	**23**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**3**	**3**	**24.3**	**28.1**
06-22	**539**	**509**	**0**	**23**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**3**	**3**	**24.5**	**28.4**
06-00	**551**	**521**	**0**	**23**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**3**	**3**	**24.5**	**28.4**
00-00	**558**	**528**	**0**	**23**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**3**	**3**	**24.6**	**28.4**

15 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	6	5	0	0	0	0	0	0	0	0	0	0	0	1	0	27.1	-
0100	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	22.6	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	30	-
0400	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	39	-
0500	3	2	0	1	0	0	0	0	0	0	0	0	0	0	0	23.9	-
0600	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	24.4	-
0700	7	7	0	0	0	0	0	0	0	0	0	0	0	0	0	22.7	-
0800	16	15	0	1	0	0	0	0	0	0	0	0	0	0	0	24.7	28.8
0900	25	23	0	2	0	0	0	0	0	0	0	0	0	0	0	25.1	28.4
1000	37	34	0	3	0	0	0	0	0	0	0	0	0	0	0	24.7	27.7
1100	50	48	1	0	0	0	0	0	0	0	0	0	0	0	1	24.7	28.2
1200	52	49	0	0	0	0	0	0	0	0	0	0	0	1	2	24.2	28.4
1300	54	52	0	1	0	0	0	0	0	0	0	0	0	0	1	23.7	27.2
1400	52	49	0	2	0	0	0	0	0	0	0	0	0	1	0	25.2	28.2
1500	49	47	1	0	0	0	0	0	0	0	0	0	0	1	0	24.6	27.7
1600	38	38	0	0	0	0	0	0	0	0	0	0	0	0	0	24.6	29
1700	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	24.4	27.9
1800	27	25	0	1	0	0	0	0	0	0	0	0	0	1	0	25.7	30.5
1900	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	29.5	39.1
2000	8	8	0	0	0	0	0	0	0	0	0	0	0	0	0	26.3	-
2100	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	25.8	-
2200	7	6	0	0	0	0	0	0	0	0	0	0	0	1	0	29.3	-
2300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	37.1	-
07-19	**427**	**407**	**2**	**10**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**4**	**4**	**24.6**	**28**
06-22	**455**	**435**	**2**	**10**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**4**	**4**	**24.8**	**28.2**
06-00	**463**	**442**	**2**	**10**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**4**	**24.9**	**28.3**
00-00	**476**	**453**	**2**	**11**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**4**	**24.9**	**28.4**

16 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	24	-
0500	7	5	0	1	0	0	0	0	0	0	0	0	0	1	0	27.7	-
0600	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	27.2	31.5
0700	29	19	0	7	0	0	0	0	0	0	0	0	0	0	3	25.1	29
0800	69	65	0	3	0	1	0	0	0	0	0	0	0	0	0	23.6	26.8
0900	33	33	0	0	0	0	0	0	0	0	0	0	0	0	0	24.7	28.5
1000	27	26	0	0	0	0	0	0	0	0	0	0	0	1	0	24.5	29.6
1100	31	30	0	1	0	0	0	0	0	0	0	0	0	0	0	24.8	28.9
1200	35	35	0	0	0	0	0	0	0	0	0	0	0	0	0	23.4	27.4
1300	26	23	0	3	0	0	0	0	0	0	0	0	0	0	0	24.5	27.8
1400	37	35	0	1	0	0	0	0	0	0	0	0	0	1	0	24.1	27.3
1500	77	75	0	2	0	0	0	0	0	0	0	0	0	0	0	22.3	26.3
1600	48	43	0	5	0	0	0	0	0	0	0	0	0	0	0	24.8	28.1
1700	53	52	0	0	0	0	0	0	0	0	0	0	0	1	0	24.6	28.1
1800	32	30	0	1	0	0	0	0	0	0	0	0	0	1	0	25.5	29.9
1900	21	16	0	4	0	0	0	0	0	0	0	0	0	1	0	24.9	27.7
2000	10	9	0	1	0	0	0	0	0	0	0	0	0	0	0	25.8	-
2100	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	24.9	30
2200	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	23.6	-
2300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	23.8	-
07-19	**497**	**466**	**0**	**23**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**4**	**3**	**24.1**	**28**
06-22	**552**	**515**	**0**	**28**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**3**	**24.2**	**28.1**
06-00	**556**	**519**	**0**	**28**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**3**	**24.2**	**28.1**
00-00	**566**	**527**	**0**	**29**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**3**	**24.3**	**28.2**

17 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	19	-
0100	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	31.3	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	24.1	-
0500	10	7	0	2	0	0	0	0	0	0	0	0	0	1	0	27.7	-
0600	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	25.1	-
0700	35	30	0	2	0	0	0	0	0	0	0	0	0	0	3	24.5	28.8
0800	74	69	0	5	0	0	0	0	0	0	0	0	0	0	0	23.9	27.9
0900	31	28	0	3	0	0	0	0	0	0	0	0	0	0	0	24.3	27.3
1000	20	16	0	3	0	0	0	0	0	0	0	0	0	0	1	25.2	29.3
1100	34	32	0	1	0	0	0	0	0	0	0	0	0	0	1	24.9	28.2
1200	31	29	0	0	0	0	0	0	0	0	0	0	0	0	2	23.2	27.8
1300	44	40	0	3	0	0	0	0	0	0	0	0	0	0	1	24.5	28.5
1400	54	48	1	5	0	0	0	0	0	0	0	0	0	0	0	24.3	27.6
1500	94	82	0	9	0	0	0	0	0	0	0	0	0	2	1	23.1	27.5
1600	55	49	0	4	0	0	0	0	0	0	0	0	0	0	2	23.3	27.6
1700	60	52	0	4	0	0	0	0	0	0	0	0	0	3	1	25.7	30.1
1800	49	47	0	2	0	0	0	0	0	0	0	0	0	0	0	24	28.5
1900	30	28	0	1	0	0	0	0	0	0	0	0	0	0	1	24.7	28.9
2000	11	10	0	0	0	0	0	0	0	0	0	0	0	1	0	27	31.3
2100	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	23.6	25.9
2200	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	31	-
2300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
07-19	**581**	**522**	**1**	**41**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**12**	**24.1**	**28**
06-22	**639**	**577**	**1**	**42**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**13**	**24.2**	**28**
06-00	**643**	**581**	**1**	**42**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**13**	**24.2**	**28.1**
00-00	**657**	**592**	**1**	**44**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**7**	**13**	**24.3**	**28.3**

18 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	32.1	-
0100	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	25.3	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	27.4	-
0500	5	4	0	0	0	0	0	0	0	0	0	0	0	1	0	28.6	-
0600	13	10	0	3	0	0	0	0	0	0	0	0	0	0	0	27.2	33.8
0700	42	37	0	2	0	0	0	0	0	0	0	0	0	1	2	25.7	28.2
0800	69	63	0	5	1	0	0	0	0	0	0	0	0	0	0	23.7	27.1
0900	25	23	0	1	0	1	0	0	0	0	0	0	0	0	0	23.1	27.2
1000	23	20	0	3	0	0	0	0	0	0	0	0	0	0	0	23.4	27.5
1100	31	29	0	2	0	0	0	0	0	0	0	0	0	0	0	24.6	28.5
1200	39	34	0	5	0	0	0	0	0	0	0	0	0	0	0	24.4	29.5
1300	39	38	0	1	0	0	0	0	0	0	0	0	0	0	0	24.2	27.2
1400	33	30	0	3	0	0	0	0	0	0	0	0	0	0	0	24.9	27.5
1500	97	90	0	6	0	0	0	0	0	0	0	0	0	0	1	23.3	27.4
1600	56	50	0	6	0	0	0	0	0	0	0	0	0	0	0	24.5	27.3
1700	57	52	0	3	0	0	0	0	0	0	0	0	0	1	1	24.6	28.1
1800	43	43	0	0	0	0	0	0	0	0	0	0	0	0	0	24.1	28.3
1900	23	22	0	1	0	0	0	0	0	0	0	0	0	0	0	25	29.4
2000	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	24.4	28
2100	13	12	0	1	0	0	0	0	0	0	0	0	0	0	0	24.2	27.9
2200	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	29	-
2300	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	23.7	-
07-19	**554**	**509**	**0**	**37**	**1**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**2**	**4**	**24.2**	**27.7**
06-22	**617**	**567**	**0**	**42**	**1**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**2**	**4**	**24.3**	**27.7**
06-00	**624**	**574**	**0**	**42**	**1**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**2**	**4**	**24.3**	**27.7**
00-00	**633**	**582**	**0**	**42**	**1**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**3**	**4**	**24.3**	**27.9**

19 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	3	2	0	0	0	0	0	0	0	0	0	0	0	1	0	26.5	-
0100	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	26.7	-
0200	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	22.2	-
0300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	25.8	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	6	5	0	0	0	0	0	0	0	0	0	0	0	1	0	27.2	-
0600	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	26.4	-
0700	25	23	0	2	0	0	0	0	0	0	0	0	0	0	0	24.9	28.8
0800	60	57	0	3	0	0	0	0	0	0	0	0	0	0	0	24.5	27.9
0900	34	30	0	4	0	0	0	0	0	0	0	0	0	0	0	24.4	27.9
1000	19	16	0	3	0	0	0	0	0	0	0	0	0	0	0	24.2	27.5
1100	27	25	0	2	0	0	0	0	0	0	0	0	0	0	0	23.8	28
1200	26	24	0	1	0	0	0	0	0	0	0	0	0	0	1	24.3	28.8
1300	32	29	0	2	0	0	0	0	0	0	0	0	0	0	1	24.4	28.7
1400	34	33	0	1	0	0	0	0	0	0	0	0	0	0	0	25.2	28.8
1500	73	66	0	7	0	0	0	0	0	0	0	0	0	0	0	24.1	26.6
1600	70	59	0	8	0	0	0	0	0	0	0	0	0	1	2	24.4	28.6
1700	61	55	0	5	0	0	0	0	0	0	0	0	0	1	0	24.4	27.8
1800	26	24	0	2	0	0	0	0	0	0	0	0	0	0	0	24.6	28.3
1900	27	25	0	2	0	0	0	0	0	0	0	0	0	0	0	23.6	28.1
2000	19	18	0	1	0	0	0	0	0	0	0	0	0	0	0	25.8	31.5
2100	8	8	0	0	0	0	0	0	0	0	0	0	0	0	0	27.3	-
2200	8	8	0	0	0	0	0	0	0	0	0	0	0	0	0	24.1	-
2300	2	1	0	0	0	0	0	0	0	0	0	0	0	1	0	22.4	-
07-19	**487**	**441**	**0**	**40**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**2**	**4**	**24.4**	**27.9**
06-22	**547**	**498**	**0**	**43**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**2**	**4**	**24.5**	**28**
06-00	**557**	**507**	**0**	**43**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**3**	**4**	**24.5**	**28**
00-00	**569**	**517**	**0**	**43**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**4**	**24.5**	**28**

K&MTRAFFIC SURVEYS

SITE: PUMP LANE, RAINHAM LOCATION: ATTACHED TO TELEGRAPH POLE

GRID REFERENCE: 51.375710, 0.596739 DIRECTION: NORTHBOUND SPEED LIMIT: 30

13 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	30.9	-
0100	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	26.1	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	28.8	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	7	0	0	1	4	2	0	0	0	0	0	0	0	0	0	0	28.9	-
0600	12	0	0	6	6	0	0	0	0	0	0	0	0	0	0	0	25.2	29.2
0700	25	0	0	13	11	1	0	0	0	0	0	0	0	0	0	0	25.4	30.4
0800	72	0	7	44	20	1	0	0	0	0	0	0	0	0	0	0	22.9	26.7
0900	27	0	3	18	6	0	0	0	0	0	0	0	0	0	0	0	22.2	26.3
1000	30	0	0	20	8	2	0	0	0	0	0	0	0	0	0	0	24.3	29.1
1100	39	0	5	21	11	2	0	0	0	0	0	0	0	0	0	0	23.2	27.2
1200	42	0	2	21	17	1	1	0	0	0	0	0	0	0	0	0	24.7	28.4
1300	44	0	3	25	15	1	0	0	0	0	0	0	0	0	0	0	23.7	27.4
1400	45	0	0	25	18	2	0	0	0	0	0	0	0	0	0	0	24.6	27.5
1500	93	4	11	45	31	2	0	0	0	0	0	0	0	0	0	0	22.8	26.7
1600	63	0	3	31	26	3	0	0	0	0	0	0	0	0	0	0	24.8	29.3
1700	53	1	4	25	21	2	0	0	0	0	0	0	0	0	0	0	23.9	28.4
1800	35	0	3	13	15	4	0	0	0	0	0	0	0	0	0	0	25.1	29.2
1900	33	0	2	17	11	3	0	0	0	0	0	0	0	0	0	0	24.4	27.7
2000	17	0	0	9	8	0	0	0	0	0	0	0	0	0	0	0	24.7	28.7
2100	5	0	0	3	1	1	0	0	0	0	0	0	0	0	0	0	26.5	-
2200	14	0	0	6	7	1	0	0	0	0	0	0	0	0	0	0	25.5	27.9
2300	7	0	0	0	5	1	1	0	0	0	0	0	0	0	0	0	29.4	-
07-19	**568**	**5**	**41**	**301**	**199**	**21**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**23.8**	**27.5**
06-22	**635**	**5**	**43**	**336**	**225**	**25**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**23.9**	**27.6**
06-00	**656**	**5**	**43**	**342**	**237**	**27**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24**	**27.7**
00-00	**666**	**5**	**43**	**343**	**244**	**29**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.1**	**28**

14 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	3	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	26.5	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	4	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	28.2	-
0600	8	0	1	0	5	2	0	0	0	0	0	0	0	0	0	0	27.9	-
0700	12	0	1	6	4	1	0	0	0	0	0	0	0	0	0	0	24.6	29
0800	27	0	2	9	13	3	0	0	0	0	0	0	0	0	0	0	26.5	30.8
0900	38	0	3	21	13	1	0	0	0	0	0	0	0	0	0	0	23.9	26.9
1000	52	0	4	30	18	0	0	0	0	0	0	0	0	0	0	0	23	25.9
1100	62	1	3	24	33	0	0	1	0	0	0	0	0	0	0	0	24.9	28
1200	49	1	2	23	21	2	0	0	0	0	0	0	0	0	0	0	24.6	28.4
1300	55	2	5	21	26	1	0	0	0	0	0	0	0	0	0	0	24.2	28.2
1400	54	0	1	30	19	4	0	0	0	0	0	0	0	0	0	0	24.6	28.2
1500	41	0	1	25	15	0	0	0	0	0	0	0	0	0	0	0	24.1	27.4
1600	36	0	4	18	12	2	0	0	0	0	0	0	0	0	0	0	24.1	27.8
1700	35	0	3	19	12	1	0	0	0	0	0	0	0	0	0	0	24.2	28.3
1800	36	1	1	18	15	1	0	0	0	0	0	0	0	0	0	0	24.1	29.3
1900	19	0	0	8	10	0	1	0	0	0	0	0	0	0	0	0	26.1	29.6
2000	9	0	0	3	6	0	0	0	0	0	0	0	0	0	0	0	26.3	-
2100	6	0	0	1	5	0	0	0	0	0	0	0	0	0	0	0	27	-
2200	7	0	0	2	5	0	0	0	0	0	0	0	0	0	0	0	26.3	-
2300	5	0	0	3	1	1	0	0	0	0	0	0	0	0	0	0	24.4	-
07-19	**497**	**5**	**30**	**244**	**201**	**16**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.3**	**28.1**
06-22	**539**	**5**	**31**	**256**	**227**	**18**	**1**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28.4**
06-00	**551**	**5**	**31**	**261**	**233**	**19**	**1**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28.4**
00-00	**558**	**5**	**31**	**262**	**238**	**20**	**1**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.6**	**28.4**

15 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	6	0	0	1	5	0	0	0	0	0	0	0	0	0	0	0	27.1	-
0100	2	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	22.6	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	30	-
0400	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	39	-
0500	3	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	23.9	-
0600	3	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	24.4	-
0700	7	0	1	4	2	0	0	0	0	0	0	0	0	0	0	0	22.7	-
0800	16	0	1	7	8	0	0	0	0	0	0	0	0	0	0	0	24.7	28.8
0900	25	1	0	8	16	0	0	0	0	0	0	0	0	0	0	0	25.1	28.4
1000	37	0	1	18	17	1	0	0	0	0	0	0	0	0	0	0	24.7	27.7
1100	50	1	1	25	20	3	0	0	0	0	0	0	0	0	0	0	24.7	28.2
1200	52	1	4	23	22	2	0	0	0	0	0	0	0	0	0	0	24.2	28.4
1300	54	1	1	31	21	0	0	0	0	0	0	0	0	0	0	0	23.7	27.2
1400	52	0	1	21	29	1	0	0	0	0	0	0	0	0	0	0	25.2	28.2
1500	49	0	1	25	22	1	0	0	0	0	0	0	0	0	0	0	24.6	27.7
1600	38	0	3	15	19	1	0	0	0	0	0	0	0	0	0	0	24.6	29
1700	20	0	1	9	9	1	0	0	0	0	0	0	0	0	0	0	24.4	27.9
1800	27	0	1	9	14	3	0	0	0	0	0	0	0	0	0	0	25.7	30.5
1900	14	0	0	3	6	3	2	0	0	0	0	0	0	0	0	0	29.5	39.1
2000	8	0	0	4	3	1	0	0	0	0	0	0	0	0	0	0	26.3	-
2100	3	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	25.8	-
2200	7	0	0	0	5	2	0	0	0	0	0	0	0	0	0	0	29.3	-
2300	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	37.1	-
07-19	**427**	**4**	**16**	**195**	**199**	**13**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.6**	**28**
06-22	**455**	**4**	**16**	**203**	**213**	**17**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.8**	**28.2**
06-00	**463**	**4**	**16**	**203**	**218**	**20**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.9**	**28.3**
00-00	**476**	**4**	**16**	**207**	**226**	**20**	**3**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.9**	**28.4**

16 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	3	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	24	-
0500	7	0	0	1	5	1	0	0	0	0	0	0	0	0	0	0	27.7	-
0600	12	0	0	4	5	3	0	0	0	0	0	0	0	0	0	0	27.2	31.5
0700	29	0	1	11	17	0	0	0	0	0	0	0	0	0	0	0	25.1	29
0800	69	1	2	43	22	1	0	0	0	0	0	0	0	0	0	0	23.6	26.8
0900	33	0	1	17	14	1	0	0	0	0	0	0	0	0	0	0	24.7	28.5
1000	27	3	0	8	15	1	0	0	0	0	0	0	0	0	0	0	24.5	29.6
1100	31	0	1	17	10	3	0	0	0	0	0	0	0	0	0	0	24.8	28.9
1200	35	1	4	16	12	2	0	0	0	0	0	0	0	0	0	0	23.4	27.4
1300	26	0	1	13	10	2	0	0	0	0	0	0	0	0	0	0	24.5	27.8
1400	37	0	2	19	16	0	0	0	0	0	0	0	0	0	0	0	24.1	27.3
1500	77	2	8	45	22	0	0	0	0	0	0	0	0	0	0	0	22.3	26.3
1600	48	0	2	22	23	1	0	0	0	0	0	0	0	0	0	0	24.8	28.1
1700	53	1	1	26	22	3	0	0	0	0	0	0	0	0	0	0	24.6	28.1
1800	32	0	2	12	15	3	0	0	0	0	0	0	0	0	0	0	25.5	29.9
1900	21	0	0	9	12	0	0	0	0	0	0	0	0	0	0	0	24.9	27.7
2000	10	0	1	4	3	2	0	0	0	0	0	0	0	0	0	0	25.8	-
2100	12	1	0	3	7	1	0	0	0	0	0	0	0	0	0	0	24.9	30
2200	3	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	23.6	-
2300	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	23.8	-
07-19	**497**	**8**	**25**	**249**	**198**	**17**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.1**	**28**
06-22	**552**	**9**	**26**	**269**	**225**	**23**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.2**	**28.1**
06-00	**556**	**9**	**26**	**272**	**226**	**23**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.2**	**28.1**
00-00	**566**	**9**	**26**	**275**	**232**	**24**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.3**	**28.2**

17 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	19	-
0100	2	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	31.3	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	24.1	-
0500	10	0	0	3	5	2	0	0	0	0	0	0	0	0	0	0	27.7	-
0600	6	0	1	2	2	1	0	0	0	0	0	0	0	0	0	0	25.1	-
0700	35	0	2	17	15	1	0	0	0	0	0	0	0	0	0	0	24.5	28.8
0800	74	2	3	39	30	0	0	0	0	0	0	0	0	0	0	0	23.9	27.9
0900	31	0	1	15	14	1	0	0	0	0	0	0	0	0	0	0	24.3	27.3
1000	20	0	0	9	11	0	0	0	0	0	0	0	0	0	0	0	25.2	29.3
1100	34	0	1	15	17	1	0	0	0	0	0	0	0	0	0	0	24.9	28.2
1200	31	0	4	16	11	0	0	0	0	0	0	0	0	0	0	0	23.2	27.8
1300	44	0	4	20	16	4	0	0	0	0	0	0	0	0	0	0	24.5	28.5
1400	54	0	3	26	24	1	0	0	0	0	0	0	0	0	0	0	24.3	27.6
1500	94	2	9	49	31	3	0	0	0	0	0	0	0	0	0	0	23.1	27.5
1600	55	1	6	29	16	3	0	0	0	0	0	0	0	0	0	0	23.3	27.6
1700	60	0	2	27	24	6	1	0	0	0	0	0	0	0	0	0	25.7	30.1
1800	49	0	4	29	13	3	0	0	0	0	0	0	0	0	0	0	24	28.5
1900	30	0	1	17	9	3	0	0	0	0	0	0	0	0	0	0	24.7	28.9
2000	11	0	1	2	7	0	1	0	0	0	0	0	0	0	0	0	27	31.3
2100	11	0	0	7	4	0	0	0	0	0	0	0	0	0	0	0	23.6	25.9
2200	4	0	0	0	3	0	1	0	0	0	0	0	0	0	0	0	31	-
2300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
07-19	**581**	**5**	**39**	**291**	**222**	**23**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.1**	**28**
06-22	**639**	**5**	**42**	**319**	**244**	**27**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.2**	**28**
06-00	**643**	**5**	**42**	**319**	**247**	**27**	**3**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.2**	**28.1**
00-00	**657**	**5**	**42**	**324**	**253**	**30**	**3**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.3**	**28.3**

18 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	32.1	-
0100	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	25.3	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	2	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	27.4	-
0500	5	0	0	1	3	1	0	0	0	0	0	0	0	0	0	0	28.6	-
0600	13	0	0	5	6	1	1	0	0	0	0	0	0	0	0	0	27.2	33.8
0700	42	0	1	17	22	2	0	0	0	0	0	0	0	0	0	0	25.7	28.2
0800	69	0	2	41	26	0	0	0	0	0	0	0	0	0	0	0	23.7	27.1
0900	25	0	4	12	9	0	0	0	0	0	0	0	0	0	0	0	23.1	27.2
1000	23	2	0	13	8	0	0	0	0	0	0	0	0	0	0	0	23.4	27.5
1100	31	0	0	16	14	1	0	0	0	0	0	0	0	0	0	0	24.6	28.5
1200	39	0	3	19	12	5	0	0	0	0	0	0	0	0	0	0	24.4	29.5
1300	39	0	1	22	15	1	0	0	0	0	0	0	0	0	0	0	24.2	27.2
1400	33	0	1	13	18	1	0	0	0	0	0	0	0	0	0	0	24.9	27.5
1500	97	4	5	54	31	2	1	0	0	0	0	0	0	0	0	0	23.3	27.4
1600	56	0	2	30	22	1	1	0	0	0	0	0	0	0	0	0	24.5	27.3
1700	57	0	4	26	24	3	0	0	0	0	0	0	0	0	0	0	24.6	28.1
1800	43	0	5	19	15	4	0	0	0	0	0	0	0	0	0	0	24.1	28.3
1900	23	0	1	12	9	1	0	0	0	0	0	0	0	0	0	0	25	29.4
2000	14	0	1	7	6	0	0	0	0	0	0	0	0	0	0	0	24.4	28
2100	13	0	1	5	6	1	0	0	0	0	0	0	0	0	0	0	24.2	27.9
2200	3	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	29	-
2300	4	0	1	1	2	0	0	0	0	0	0	0	0	0	0	0	23.7	-
07-19	**554**	**6**	**28**	**282**	**216**	**20**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.2**	**27.7**
06-22	**617**	**6**	**31**	**311**	**243**	**23**	**3**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.3**	**27.7**
06-00	**624**	**6**	**32**	**313**	**246**	**24**	**3**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.3**	**27.7**
00-00	**633**	**6**	**32**	**315**	**251**	**26**	**3**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.3**	**27.9**

19 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	3	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	26.5	-
0100	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	26.7	-
0200	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	22.2	-
0300	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	25.8	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	6	0	0	2	3	1	0	0	0	0	0	0	0	0	0	0	27.2	-
0600	6	0	0	2	2	2	0	0	0	0	0	0	0	0	0	0	26.4	-
0700	25	0	1	11	13	0	0	0	0	0	0	0	0	0	0	0	24.9	28.8
0800	60	0	3	30	26	1	0	0	0	0	0	0	0	0	0	0	24.5	27.9
0900	34	0	0	18	15	1	0	0	0	0	0	0	0	0	0	0	24.4	27.9
1000	19	0	1	11	7	0	0	0	0	0	0	0	0	0	0	0	24.2	27.5
1100	27	0	2	18	7	0	0	0	0	0	0	0	0	0	0	0	23.8	28
1200	26	0	3	10	10	3	0	0	0	0	0	0	0	0	0	0	24.3	28.8
1300	32	0	4	11	16	1	0	0	0	0	0	0	0	0	0	0	24.4	28.7
1400	34	0	0	17	16	1	0	0	0	0	0	0	0	0	0	0	25.2	28.8
1500	73	0	2	42	28	1	0	0	0	0	0	0	0	0	0	0	24.1	26.6
1600	70	2	2	35	27	4	0	0	0	0	0	0	0	0	0	0	24.4	28.6
1700	61	0	3	28	30	0	0	0	0	0	0	0	0	0	0	0	24.4	27.8
1800	26	0	1	14	11	0	0	0	0	0	0	0	0	0	0	0	24.6	28.3
1900	27	1	2	14	10	0	0	0	0	0	0	0	0	0	0	0	23.6	28.1
2000	19	0	0	9	7	3	0	0	0	0	0	0	0	0	0	0	25.8	31.5
2100	8	0	0	1	6	1	0	0	0	0	0	0	0	0	0	0	27.3	-
2200	8	0	0	4	4	0	0	0	0	0	0	0	0	0	0	0	24.1	-
2300	2	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	22.4	-
07-19	**487**	**2**	**22**	**245**	**206**	**12**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.4**	**27.9**
06-22	**547**	**3**	**24**	**271**	**231**	**18**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28**
06-00	**557**	**3**	**24**	**276**	**236**	**18**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28**
00-00	**569**	**3**	**24**	**280**	**243**	**19**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28**

Grand Total

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
--	4125	37	214	2006	1687	168	12	1	0	0	0	0	0	0	0	0	24.4	28.1

K&MTRAFFIC SURVEYS

SITE: PUMP LANE, RAINHAM LOCATION: ATTACHED TO TELEGRAPH POLE

GRID REFERENCE: 51.375710, 0.596739 DIRECTION: NORTHBOUND SPEED LIMIT: 30

	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Averages	
	13-Oct	14-Oct	15-Oct	16-Oct	17-Oct	18-Oct	19-Oct	1-5.	1-7.
Hour									
0000-0100	1	3	6	0	1	1	3	1.2	2.1
0100-0200	1	0	2	0	2	1	1	1	1
0200-0300	0	0	0	0	0	0	1	0.2	0.1
0300-0400	1	0	1	0	0	0	1	0.4	0.4
0400-0500	0	0	1	3	1	2	0	1.2	1
0500-0600	7	4	3	7	10	5	6	7	6
0600-0700	12	8	3	12	6	13	6	9.8	8.6
0700-0800	25	12	7	29	35	42	25	31.2	25
0800-0900	72	27	16	69	74	69	60	68.8	55.3
0900-1000	27	38	25	33	31	25	34	30	30.4
1000-1100	30	52	37	27	20	23	19	23.8	29.7
1100-1200	39	62	50	31	34	31	27	32.4	39.1
1200-1300	42	49	52	35	31	39	26	34.6	39.1
1300-1400	44	55	54	26	44	39	32	37	42
1400-1500	45	54	52	37	54	33	34	40.6	44.1
1500-1600	93	41	49	77	94	97	73	86.8	74.9
1600-1700	63	36	38	48	55	56	70	58.4	52.3
1700-1800	53	35	20	53	60	57	61	56.8	48.4
1800-1900	35	36	27	32	49	43	26	37	35.4
1900-2000	33	19	14	21	30	23	27	26.8	23.9
2000-2100	17	9	8	10	11	14	19	14.2	12.6
2100-2200	5	6	3	12	11	13	8	9.8	8.3
2200-2300	14	7	7	3	4	3	8	6.4	6.6
2300-2400	7	5	1	1	0	4	2	2.8	2.9
Totals									
0700-1900	568	497	427	497	581	554	487	537.4	515.9
0600-2200	635	539	455	552	639	617	547	598	569.1
0600-0000	656	551	463	556	643	624	557	607.2	578.6
0000-0000	666	558	476	566	657	633	569	618.2	589.3
AM Peak	800	1100	1100	800	800	800	800		
	72	62	50	69	74	69	60		
PM Peak	1500	1300	1300	1500	1500	1500	1500		
	93	55	54	77	94	97	73		

K&MTRAFFIC SURVEYS

SITE: PUMP LANE, RAINHAM LOCATION: ATTACHED TO TELEGRAPH POLE

GRID REFERENCE: 51.375710, 0.596739 DIRECTION: SOUTHBOUND SPEED LIMIT: 30

13 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	3	2	0	1	0	0	0	0	0	0	0	0	0	0	0	21.7	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	35.4	-
0300	2	1	0	1	0	0	0	0	0	0	0	0	0	0	0	31.1	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	3	2	0	0	0	0	0	0	0	0	0	0	0	1	0	26	-
0600	15	14	0	1	0	0	0	0	0	0	0	0	0	0	0	28.5	31.4
0700	51	44	0	7	0	0	0	0	0	0	0	0	0	0	0	25.4	30.2
0800	114	109	1	3	0	0	0	0	0	0	0	0	0	0	1	22.8	26.4
0900	41	38	0	3	0	0	0	0	0	0	0	0	0	0	0	22.9	25.1
1000	49	44	0	5	0	0	0	0	0	0	0	0	0	0	0	24	28.2
1100	42	38	0	4	0	0	0	0	0	0	0	0	0	0	0	22.6	26.9
1200	44	40	0	3	0	0	0	0	0	0	0	0	0	1	0	24.4	27.6
1300	46	45	0	1	0	0	0	0	0	0	0	0	0	0	0	24	27.2
1400	64	57	0	7	0	0	0	0	0	0	0	0	0	0	0	23.6	27.8
1500	80	70	0	9	1	0	0	0	0	0	0	0	0	0	0	24.7	28
1600	63	59	0	4	0	0	0	0	0	0	0	0	0	0	0	24.9	29.7
1700	54	45	1	4	0	0	0	0	0	0	0	0	0	4	0	25	28.8
1800	43	40	0	3	0	0	0	0	0	0	0	0	0	0	0	26.6	30.3
1900	29	26	0	1	0	0	0	0	0	0	0	0	0	1	1	24.8	30.8
2000	21	20	0	1	0	0	0	0	0	0	0	0	0	0	0	24.9	30.3
2100	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	27.8	-
2200	8	8	0	0	0	0	0	0	0	0	0	0	0	0	0	25.2	-
2300	9	8	0	0	0	0	0	0	0	0	0	0	0	1	0	27	-
07-19	**691**	**629**	**2**	**53**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**1**	**24.1**	**28.1**
06-22	**766**	**699**	**2**	**56**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**2**	**24.3**	**28.5**
06-00	**783**	**715**	**2**	**56**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**7**	**2**	**24.4**	**28.5**
00-00	**792**	**721**	**2**	**58**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**8**	**2**	**24.4**	**28.5**

14 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	4	3	0	1	0	0	0	0	0	0	0	0	0	0	0	29.2	-
0100	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	26	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	3	2	0	1	0	0	0	0	0	0	0	0	0	0	0	27.8	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	2	1	0	1	0	0	0	0	0	0	0	0	0	0	0	20.2	-
0600	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	31.9	-
0700	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	26.5	-
0800	54	52	0	2	0	0	0	0	0	0	0	0	0	0	0	24.4	29.2
0900	52	47	0	4	0	0	0	1	0	0	0	0	0	0	0	24.1	27.7
1000	54	49	0	4	0	0	0	0	0	0	0	0	0	0	1	24	28.6
1100	49	46	0	3	0	0	0	0	0	0	0	0	0	0	0	23.2	26.6
1200	62	55	0	5	1	0	0	0	0	0	0	0	0	1	0	24.2	29.4
1300	46	43	0	2	0	0	0	0	0	0	0	0	0	1	0	23.2	27.8
1400	64	58	0	4	0	0	0	0	0	0	0	0	0	2	0	23.9	28
1500	52	49	0	2	0	0	0	0	0	0	0	0	0	0	1	24.8	28.8
1600	49	45	0	3	0	0	0	0	0	0	0	0	0	1	0	24.3	27.2
1700	40	38	0	1	0	0	0	0	0	0	0	0	0	1	0	25.8	29.1
1800	32	30	0	2	0	0	0	0	0	0	0	0	0	0	0	24.2	28.1
1900	35	35	0	0	0	0	0	0	0	0	0	0	0	0	0	27.5	32.5
2000	18	17	0	1	0	0	0	0	0	0	0	0	0	0	0	28.4	35.8
2100	7	7	0	0	0	0	0	0	0	0	0	0	0	0	0	23.7	-
2200	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	25.8	-
2300	8	7	0	0	0	0	0	0	0	0	0	0	0	1	0	27.8	-
07-19	**564**	**522**	**0**	**32**	**1**	**0**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**6**	**2**	**24.2**	**28.3**
06-22	**628**	**585**	**0**	**33**	**1**	**0**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**6**	**2**	**24.6**	**28.8**
06-00	**646**	**602**	**0**	**33**	**1**	**0**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**7**	**2**	**24.6**	**28.9**
00-00	**658**	**611**	**0**	**36**	**1**	**0**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**7**	**2**	**24.7**	**28.9**

15 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	25.8	-
0100	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	28.5	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	28.4	-
0400	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	24	-
0500	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0600	4	3	0	1	0	0	0	0	0	0	0	0	0	0	0	28.8	-
0700	9	7	0	1	0	0	0	0	0	0	0	0	0	0	1	25.7	-
0800	14	13	0	0	0	0	0	0	0	0	0	0	0	0	1	25.5	29.6
0900	45	43	0	1	0	0	0	0	0	0	0	0	0	0	1	24.7	28.8
1000	36	33	0	3	0	0	0	0	0	0	0	0	0	0	0	24.4	28.1
1100	62	61	0	0	0	0	0	0	0	0	0	0	0	1	0	23.4	27.3
1200	52	50	1	1	0	0	0	0	0	0	0	0	0	0	0	24.4	28
1300	58	51	0	4	0	1	0	0	0	0	0	0	0	2	0	23.9	27.6
1400	51	45	1	3	0	0	0	0	0	0	0	0	0	0	2	23.2	26.8
1500	48	48	0	0	0	0	0	0	0	0	0	0	0	0	0	24.6	29.2
1600	38	36	0	1	0	0	0	0	0	0	0	0	0	1	0	24.4	27.4
1700	31	30	0	0	0	0	0	0	0	0	0	0	0	1	0	25.6	30.1
1800	20	19	0	1	0	0	0	0	0	0	0	0	0	0	0	25.5	30.1
1900	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	28.7	35
2000	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	26.6	-
2100	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	25.9	-
2200	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	26.5	-
2300	2	1	0	0	0	0	0	0	0	0	0	0	0	1	0	28.9	-
07-19	**464**	**436**	**2**	**15**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**5**	**24.3**	**28.1**
06-22	**496**	**467**	**2**	**16**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**5**	**24.5**	**28.5**
06-00	**502**	**472**	**2**	**16**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**5**	**24.6**	**28.6**
00-00	**515**	**485**	**2**	**16**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**5**	**24.6**	**28.7**

16 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	33.2	-
0500	5	4	0	0	0	0	0	0	0	0	0	0	0	0	1	24.3	-
0600	15	14	0	0	1	0	0	0	0	0	0	0	0	0	0	26.8	30.4
0700	41	36	0	5	0	0	0	0	0	0	0	0	0	0	0	25.3	29.3
0800	135	131	0	4	0	0	0	0	0	0	0	0	0	0	0	24.1	27.5
0900	38	36	0	2	0	0	0	0	0	0	0	0	0	0	0	24.8	28.5
1000	38	34	0	4	0	0	0	0	0	0	0	0	0	0	0	25.2	29.1
1100	34	33	0	1	0	0	0	0	0	0	0	0	0	0	0	23.7	27.8
1200	43	41	0	0	0	0	0	0	0	0	0	0	0	2	0	24	29.9
1300	44	39	1	4	0	0	0	0	0	0	0	0	0	0	0	24.3	28.5
1400	51	42	0	5	1	0	0	0	0	0	0	0	0	3	0	25	28.2
1500	67	62	0	5	0	0	0	0	0	0	0	0	0	0	0	24.1	27.8
1600	57	49	0	7	0	0	0	0	0	0	0	0	0	1	0	24.9	29.2
1700	59	57	0	0	0	0	0	0	0	0	0	0	0	0	2	24.8	27.8
1800	44	39	0	4	0	0	0	0	0	0	0	0	0	1	0	26.2	30
1900	14	13	0	1	0	0	0	0	0	0	0	0	0	0	0	26	32.6
2000	11	9	0	2	0	0	0	0	0	0	0	0	0	0	0	26.9	31.9
2100	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	26.1	-
2200	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	29	-
2300	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	36.6	-
07-19	**651**	**599**	**1**	**41**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**7**	**2**	**24.6**	**28.4**
06-22	**697**	**641**	**1**	**44**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**7**	**2**	**24.8**	**28.6**
06-00	**702**	**646**	**1**	**44**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**7**	**2**	**24.8**	**28.6**
00-00	**708**	**651**	**1**	**44**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**7**	**3**	**24.8**	**28.6**

17 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	34.5	-
0100	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	30.9	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	33.7	-
0500	5	4	0	1	0	0	0	0	0	0	0	0	0	0	0	28.2	-
0600	16	13	0	3	0	0	0	0	0	0	0	0	0	0	0	27.4	30.7
0700	50	46	0	3	0	0	1	0	0	0	0	0	0	0	0	25.5	30.1
0800	151	146	0	5	0	0	0	0	0	0	0	0	0	0	0	23.2	27
0900	32	28	0	4	0	0	0	0	0	0	0	0	0	0	0	24.1	28.5
1000	38	32	0	5	1	0	0	0	0	0	0	0	0	0	0	25.5	30.5
1100	40	39	0	1	0	0	0	0	0	0	0	0	0	0	0	24.5	28.8
1200	48	42	0	4	1	0	0	0	0	0	0	0	0	0	1	25	29.9
1300	41	37	0	3	0	0	0	0	0	0	0	0	0	0	1	23.4	28
1400	64	53	0	9	0	0	0	0	1	0	0	0	0	1	0	23.2	26.7
1500	69	65	1	2	0	0	0	0	0	0	0	0	0	1	0	23.1	27.6
1600	71	58	1	6	0	0	0	0	0	0	0	0	0	5	1	24.5	28
1700	80	71	0	6	0	0	0	0	0	0	0	0	0	0	3	25	29.1
1800	43	38	0	3	0	0	0	0	0	0	0	0	0	2	0	24.6	30.3
1900	30	29	0	1	0	0	0	0	0	0	0	0	0	0	0	27.4	31
2000	18	17	0	0	0	0	0	0	0	0	0	0	0	1	0	26.8	32.5
2100	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	25.7	30.6
2200	8	8	0	0	0	0	0	0	0	0	0	0	0	0	0	25.6	-
2300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	18.5	-
07-19	**727**	**655**	**2**	**51**	**2**	**0**	**1**	**0**	**1**	**0**	**0**	**0**	**0**	**9**	**6**	**24.1**	**28.4**
06-22	**802**	**725**	**2**	**55**	**2**	**0**	**1**	**0**	**1**	**0**	**0**	**0**	**0**	**10**	**6**	**24.4**	**28.7**
06-00	**811**	**734**	**2**	**55**	**2**	**0**	**1**	**0**	**1**	**0**	**0**	**0**	**0**	**10**	**6**	**24.4**	**28.7**
00-00	**819**	**740**	**2**	**57**	**2**	**0**	**1**	**0**	**1**	**0**	**0**	**0**	**0**	**10**	**6**	**24.4**	**28.7**

18 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0100	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	24.8	-
0200	2	1	0	1	0	0	0	0	0	0	0	0	0	0	0	31.3	-
0300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	35	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	6	4	0	0	0	0	0	0	0	0	0	0	0	1	1	26.3	-
0600	25	22	0	3	0	0	0	0	0	0	0	0	0	0	0	27.5	31.1
0700	53	48	0	4	0	0	1	0	0	0	0	0	0	0	0	24.6	28.4
0800	143	134	0	9	0	0	0	0	0	0	0	0	0	0	0	24.4	27.8
0900	35	32	0	1	0	1	0	0	0	0	0	0	0	0	1	23.4	28.2
1000	41	34	0	6	0	0	0	0	1	0	0	0	0	0	0	25.4	28.2
1100	46	41	0	5	0	0	0	0	0	0	0	0	0	0	0	25.3	29.9
1200	37	34	0	3	0	0	0	0	0	0	0	0	0	0	0	23.5	27.7
1300	42	37	0	5	0	0	0	0	0	0	0	0	0	0	0	24.5	29.5
1400	56	54	0	2	0	0	0	0	0	0	0	0	0	0	0	24.8	27.4
1500	77	71	0	5	0	0	0	0	0	0	0	0	0	1	0	23.8	28.6
1600	61	56	0	4	0	0	0	0	0	0	0	0	0	1	0	24.5	27.8
1700	70	65	0	3	0	0	0	0	0	0	0	0	0	2	0	24.5	27.9
1800	44	44	0	0	0	0	0	0	0	0	0	0	0	0	0	24.1	28.9
1900	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	25.1	28
2000	9	7	0	2	0	0	0	0	0	0	0	0	0	0	0	21.9	-
2100	13	13	0	0	0	0	0	0	0	0	0	0	0	0	0	21.9	26.4
2200	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	26.1	-
2300	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	25	-
07-19	**705**	**650**	**0**	**47**	**0**	**1**	**1**	**0**	**1**	**0**	**0**	**0**	**0**	**4**	**1**	**24.4**	**27.9**
06-22	**772**	**712**	**0**	**52**	**0**	**1**	**1**	**0**	**1**	**0**	**0**	**0**	**0**	**4**	**1**	**24.5**	**28**
06-00	**778**	**718**	**0**	**52**	**0**	**1**	**1**	**0**	**1**	**0**	**0**	**0**	**0**	**4**	**1**	**24.5**	**28**
00-00	**788**	**725**	**0**	**53**	**0**	**1**	**1**	**0**	**1**	**0**	**0**	**0**	**0**	**5**	**2**	**24.5**	**28.1**

19 October 2023

Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Cls 11	Cls 12	Cls 14	Cls 15	Mean	Vpp 85
0000	2	1	0	0	0	0	0	0	0	0	0	0	0	0	1	19.4	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	2	1	0	1	0	0	0	0	0	0	0	0	0	0	0	29.2	-
0500	11	9	0	1	0	0	0	0	0	0	0	0	0	1	0	26.8	32.5
0600	6	3	0	2	0	0	0	0	0	0	0	0	0	1	0	28.2	-
0700	50	47	0	3	0	0	0	0	0	0	0	0	0	0	0	24.9	29.2
0800	140	133	0	7	0	0	0	0	0	0	0	0	0	0	0	22.7	27
0900	52	50	0	2	0	0	0	0	0	0	0	0	0	0	0	24.5	28.5
1000	37	34	0	3	0	0	0	0	0	0	0	0	0	0	0	24.3	30
1100	34	30	1	3	0	0	0	0	0	0	0	0	0	0	0	24.8	29
1200	43	40	0	2	0	0	0	0	0	0	0	0	0	1	0	23.7	27.3
1300	31	27	0	4	0	0	0	0	0	0	0	0	0	0	0	25.5	31.1
1400	72	65	0	6	0	0	0	0	0	0	0	0	0	1	0	24.6	27.9
1500	55	50	0	5	0	0	0	0	0	0	0	0	0	0	0	24	28.2
1600	69	61	0	8	0	0	0	0	0	0	0	0	0	0	0	23.6	27.2
1700	57	55	0	2	0	0	0	0	0	0	0	0	0	0	0	23.9	28
1800	39	37	0	2	0	0	0	0	0	0	0	0	0	0	0	24.8	27.6
1900	26	24	0	2	0	0	0	0	0	0	0	0	0	0	0	23.5	27.5
2000	8	7	0	1	0	0	0	0	0	0	0	0	0	0	0	26.4	-
2100	9	9	0	0	0	0	0	0	0	0	0	0	0	0	0	25.6	-
2200	9	9	0	0	0	0	0	0	0	0	0	0	0	0	0	23.5	-
2300	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	31.3	-
07-19	**679**	**629**	**1**	**47**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**2**	**0**	**24**	**28.1**
06-22	**728**	**672**	**1**	**52**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**3**	**0**	**24.1**	**28.1**
06-00	**738**	**682**	**1**	**52**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**3**	**0**	**24.1**	**28.1**
00-00	**753**	**693**	**1**	**54**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**4**	**1**	**24.1**	**28.3**

K&MTRAFFIC SURVEYS

SITE: PUMP LANE, RAINHAM LOCATION: ATTACHED TO TELEGRAPH POLE

GRID REFERENCE: 51.375710, 0.596739 DIRECTION: SOUTHBOUND SPEED LIMIT: 30

13 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	3	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	21.7	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	35.4	-
0300	2	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	31.1	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	3	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	26	-
0600	15	0	0	1	12	2	0	0	0	0	0	0	0	0	0	0	28.5	31.4
0700	51	0	3	22	21	5	0	0	0	0	0	0	0	0	0	0	25.4	30.2
0800	114	1	12	76	23	2	0	0	0	0	0	0	0	0	0	0	22.8	26.4
0900	41	0	6	26	8	1	0	0	0	0	0	0	0	0	0	0	22.9	25.1
1000	49	0	3	29	17	0	0	0	0	0	0	0	0	0	0	0	24	28.2
1100	42	0	8	20	14	0	0	0	0	0	0	0	0	0	0	0	22.6	26.9
1200	44	0	0	26	17	1	0	0	0	0	0	0	0	0	0	0	24.4	27.6
1300	46	0	3	23	19	1	0	0	0	0	0	0	0	0	0	0	24	27.2
1400	64	0	4	37	22	1	0	0	0	0	0	0	0	0	0	0	23.6	27.8
1500	80	1	3	38	34	4	0	0	0	0	0	0	0	0	0	0	24.7	28
1600	63	1	2	24	31	5	0	0	0	0	0	0	0	0	0	0	24.9	29.7
1700	54	1	1	29	18	5	0	0	0	0	0	0	0	0	0	0	25	28.8
1800	43	0	2	11	26	4	0	0	0	0	0	0	0	0	0	0	26.6	30.3
1900	29	1	4	7	13	4	0	0	0	0	0	0	0	0	0	0	24.8	30.8
2000	21	1	1	9	8	2	0	0	0	0	0	0	0	0	0	0	24.9	30.3
2100	10	0	0	3	5	2	0	0	0	0	0	0	0	0	0	0	27.8	-
2200	8	0	0	4	4	0	0	0	0	0	0	0	0	0	0	0	25.2	-
2300	9	0	0	3	4	1	1	0	0	0	0	0	0	0	0	0	27	-
07-19	**691**	**4**	**47**	**361**	**250**	**29**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.1**	**28.1**
06-22	**766**	**6**	**52**	**381**	**288**	**39**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.3**	**28.5**
06-00	**783**	**6**	**52**	**388**	**296**	**40**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.4**	**28.5**
00-00	**792**	**6**	**52**	**392**	**299**	**42**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.4**	**28.5**

14 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	4	0	0	0	3	1	0	0	0	0	0	0	0	0	0	0	29.2	-
0100	3	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	26	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	3	0	0	0	2	1	0	0	0	0	0	0	0	0	0	0	27.8	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	2	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	20.2	-
0600	4	0	0	0	2	2	0	0	0	0	0	0	0	0	0	0	31.9	-
0700	10	0	0	4	4	2	0	0	0	0	0	0	0	0	0	0	26.5	-
0800	54	0	2	31	19	2	0	0	0	0	0	0	0	0	0	0	24.4	29.2
0900	52	0	3	25	23	1	0	0	0	0	0	0	0	0	0	0	24.1	27.7
1000	54	0	6	23	24	1	0	0	0	0	0	0	0	0	0	0	24	28.6
1100	49	0	9	25	12	2	0	1	0	0	0	0	0	0	0	0	23.2	26.6
1200	62	1	6	30	20	5	0	0	0	0	0	0	0	0	0	0	24.2	29.4
1300	46	1	9	18	17	1	0	0	0	0	0	0	0	0	0	0	23.2	27.8
1400	64	0	9	26	28	1	0	0	0	0	0	0	0	0	0	0	23.9	28
1500	52	1	1	25	25	0	0	0	0	0	0	0	0	0	0	0	24.8	28.8
1600	49	0	4	25	20	0	0	0	0	0	0	0	0	0	0	0	24.3	27.2
1700	40	0	0	14	24	2	0	0	0	0	0	0	0	0	0	0	25.8	29.1
1800	32	1	1	17	12	1	0	0	0	0	0	0	0	0	0	0	24.2	28.1
1900	35	0	1	9	17	8	0	0	0	0	0	0	0	0	0	0	27.5	32.5
2000	18	0	0	6	8	3	0	1	0	0	0	0	0	0	0	0	28.4	35.8
2100	7	0	0	4	3	0	0	0	0	0	0	0	0	0	0	0	23.7	-
2200	10	0	0	5	4	1	0	0	0	0	0	0	0	0	0	0	25.8	-
2300	8	0	0	2	4	2	0	0	0	0	0	0	0	0	0	0	27.8	-
07-19	**564**	**4**	**50**	**263**	**228**	**18**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.2**	**28.3**
06-22	**628**	**4**	**51**	**282**	**258**	**31**	**0**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.6**	**28.8**
06-00	**646**	**4**	**51**	**289**	**266**	**34**	**0**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.6**	**28.9**
00-00	**658**	**4**	**51**	**292**	**273**	**36**	**0**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.7**	**28.9**

15 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	6	0	0	3	2	1	0	0	0	0	0	0	0	0	0	0	25.8	-
0100	5	0	0	1	2	2	0	0	0	0	0	0	0	0	0	0	28.5	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	28.4	-
0400	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	24	-
0500	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0600	4	0	0	1	1	2	0	0	0	0	0	0	0	0	0	0	28.8	-
0700	9	1	0	0	7	1	0	0	0	0	0	0	0	0	0	0	25.7	-
0800	14	0	1	5	8	0	0	0	0	0	0	0	0	0	0	0	25.5	29.6
0900	45	0	3	17	24	1	0	0	0	0	0	0	0	0	0	0	24.7	28.8
1000	36	0	4	13	18	1	0	0	0	0	0	0	0	0	0	0	24.4	28.1
1100	62	1	5	33	21	2	0	0	0	0	0	0	0	0	0	0	23.4	27.3
1200	52	0	2	27	22	1	0	0	0	0	0	0	0	0	0	0	24.4	28
1300	58	0	7	28	20	3	0	0	0	0	0	0	0	0	0	0	23.9	27.6
1400	51	1	5	25	20	0	0	0	0	0	0	0	0	0	0	0	23.2	26.8
1500	48	0	4	20	22	2	0	0	0	0	0	0	0	0	0	0	24.6	29.2
1600	38	0	2	20	15	1	0	0	0	0	0	0	0	0	0	0	24.4	27.4
1700	31	0	2	11	15	3	0	0	0	0	0	0	0	0	0	0	25.6	30.1
1800	20	0	1	8	9	2	0	0	0	0	0	0	0	0	0	0	25.5	30.1
1900	15	0	0	3	10	0	2	0	0	0	0	0	0	0	0	0	28.7	35
2000	10	0	0	5	4	1	0	0	0	0	0	0	0	0	0	0	26.6	-
2100	3	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	25.9	-
2200	4	0	0	1	2	1	0	0	0	0	0	0	0	0	0	0	26.5	-
2300	2	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	28.9	-
07-19	**464**	**3**	**36**	**207**	**201**	**17**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.3**	**28.1**
06-22	**496**	**3**	**36**	**217**	**218**	**20**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28.5**
06-00	**502**	**3**	**36**	**218**	**221**	**22**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.6**	**28.6**
00-00	**515**	**3**	**36**	**223**	**226**	**25**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.6**	**28.7**

16 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	33.2	-
0500	5	0	1	1	3	0	0	0	0	0	0	0	0	0	0	0	24.3	-
0600	15	0	0	4	10	1	0	0	0	0	0	0	0	0	0	0	26.8	30.4
0700	41	0	2	18	18	3	0	0	0	0	0	0	0	0	0	0	25.3	29.3
0800	135	1	11	68	50	5	0	0	0	0	0	0	0	0	0	0	24.1	27.5
0900	38	0	2	15	20	1	0	0	0	0	0	0	0	0	0	0	24.8	28.5
1000	38	0	1	16	20	1	0	0	0	0	0	0	0	0	0	0	25.2	29.1
1100	34	1	4	16	12	1	0	0	0	0	0	0	0	0	0	0	23.7	27.8
1200	43	0	4	19	18	2	0	0	0	0	0	0	0	0	0	0	24	29.9
1300	44	0	4	23	13	4	0	0	0	0	0	0	0	0	0	0	24.3	28.5
1400	51	0	3	20	25	3	0	0	0	0	0	0	0	0	0	0	25	28.2
1500	67	1	4	31	30	1	0	0	0	0	0	0	0	0	0	0	24.1	27.8
1600	57	1	5	18	30	3	0	0	0	0	0	0	0	0	0	0	24.9	29.2
1700	59	0	4	24	30	1	0	0	0	0	0	0	0	0	0	0	24.8	27.8
1800	44	0	1	14	26	3	0	0	0	0	0	0	0	0	0	0	26.2	30
1900	14	0	1	5	5	3	0	0	0	0	0	0	0	0	0	0	26	32.6
2000	11	0	0	2	7	2	0	0	0	0	0	0	0	0	0	0	26.9	31.9
2100	6	0	0	2	4	0	0	0	0	0	0	0	0	0	0	0	26.1	-
2200	3	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	29	-
2300	2	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	36.6	-
07-19	**651**	**4**	**45**	**282**	**292**	**28**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.6**	**28.4**
06-22	**697**	**4**	**46**	**295**	**318**	**34**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.8**	**28.6**
06-00	**702**	**4**	**46**	**296**	**320**	**35**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.8**	**28.6**
00-00	**708**	**4**	**47**	**297**	**323**	**36**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.8**	**28.6**

17 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	34.5	-
0100	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	30.9	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	33.7	-
0500	5	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	28.2	-
0600	16	0	0	4	11	1	0	0	0	0	0	0	0	0	0	0	27.4	30.7
0700	50	0	3	17	27	3	0	0	0	0	0	0	0	0	0	0	25.5	30.1
0800	151	5	15	72	57	2	0	0	0	0	0	0	0	0	0	0	23.2	27
0900	32	0	3	16	13	0	0	0	0	0	0	0	0	0	0	0	24.1	28.5
1000	38	0	1	16	17	4	0	0	0	0	0	0	0	0	0	0	25.5	30.5
1100	40	0	1	23	13	3	0	0	0	0	0	0	0	0	0	0	24.5	28.8
1200	48	1	6	15	21	5	0	0	0	0	0	0	0	0	0	0	25	29.9
1300	41	1	3	24	11	2	0	0	0	0	0	0	0	0	0	0	23.4	28
1400	64	0	8	36	19	1	0	0	0	0	0	0	0	0	0	0	23.2	26.7
1500	69	1	9	34	23	2	0	0	0	0	0	0	0	0	0	0	23.1	27.6
1600	71	1	6	27	33	4	0	0	0	0	0	0	0	0	0	0	24.5	28
1700	80	1	4	31	40	4	0	0	0	0	0	0	0	0	0	0	25	29.1
1800	43	0	6	17	15	5	0	0	0	0	0	0	0	0	0	0	24.6	30.3
1900	30	0	1	7	18	3	1	0	0	0	0	0	0	0	0	0	27.4	31
2000	18	0	1	8	6	2	1	0	0	0	0	0	0	0	0	0	26.8	32.5
2100	11	0	1	4	5	1	0	0	0	0	0	0	0	0	0	0	25.7	30.6
2200	8	0	0	2	6	0	0	0	0	0	0	0	0	0	0	0	25.6	-
2300	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	18.5	-
07-19	**727**	**10**	**65**	**328**	**289**	**35**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.1**	**28.4**
06-22	**802**	**10**	**68**	**351**	**329**	**42**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.4**	**28.7**
06-00	**811**	**10**	**69**	**353**	**335**	**42**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.4**	**28.7**
00-00	**819**	**10**	**69**	**353**	**341**	**44**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.4**	**28.7**

18 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0100	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	24.8	-
0200	2	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	31.3	-
0300	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	35	-
0400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0500	6	0	1	1	3	1	0	0	0	0	0	0	0	0	0	0	26.3	-
0600	25	0	0	7	15	2	1	0	0	0	0	0	0	0	0	0	27.5	31.1
0700	53	0	0	32	20	1	0	0	0	0	0	0	0	0	0	0	24.6	28.4
0800	143	0	6	70	65	2	0	0	0	0	0	0	0	0	0	0	24.4	27.8
0900	35	1	1	23	10	0	0	0	0	0	0	0	0	0	0	0	23.4	28.2
1000	41	0	1	17	21	1	1	0	0	0	0	0	0	0	0	0	25.4	28.2
1100	46	0	2	20	21	3	0	0	0	0	0	0	0	0	0	0	25.3	29.9
1200	37	0	5	15	17	0	0	0	0	0	0	0	0	0	0	0	23.5	27.7
1300	42	1	4	14	22	1	0	0	0	0	0	0	0	0	0	0	24.5	29.5
1400	56	0	2	26	26	2	0	0	0	0	0	0	0	0	0	0	24.8	27.4
1500	77	1	7	36	30	3	0	0	0	0	0	0	0	0	0	0	23.8	28.6
1600	61	1	0	37	20	3	0	0	0	0	0	0	0	0	0	0	24.5	27.8
1700	70	0	2	33	33	2	0	0	0	0	0	0	0	0	0	0	24.5	27.9
1800	44	0	2	23	19	0	0	0	0	0	0	0	0	0	0	0	24.1	28.9
1900	20	0	0	12	7	1	0	0	0	0	0	0	0	0	0	0	25.1	28
2000	9	1	0	5	3	0	0	0	0	0	0	0	0	0	0	0	21.9	-
2100	13	0	2	9	2	0	0	0	0	0	0	0	0	0	0	0	21.9	26.4
2200	4	0	0	1	3	0	0	0	0	0	0	0	0	0	0	0	26.1	-
2300	2	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	25	-
07-19	**705**	**4**	**32**	**346**	**304**	**18**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.4**	**27.9**
06-22	**772**	**5**	**34**	**379**	**331**	**21**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28**
06-00	**778**	**5**	**34**	**381**	**335**	**21**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28**
00-00	**788**	**5**	**35**	**383**	**339**	**24**	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.5**	**28.1**

19 October 2023

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
0000	2	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	19.4	-
0100	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0300	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-
0400	2	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	29.2	-
0500	11	0	0	4	5	2	0	0	0	0	0	0	0	0	0	0	26.8	32.5
0600	6	0	0	2	2	2	0	0	0	0	0	0	0	0	0	0	28.2	-
0700	50	0	4	22	22	2	0	0	0	0	0	0	0	0	0	0	24.9	29.2
0800	140	2	26	71	39	2	0	0	0	0	0	0	0	0	0	0	22.7	27
0900	52	0	2	28	20	2	0	0	0	0	0	0	0	0	0	0	24.5	28.5
1000	37	0	5	15	14	3	0	0	0	0	0	0	0	0	0	0	24.3	30
1100	34	0	3	14	15	2	0	0	0	0	0	0	0	0	0	0	24.8	29
1200	43	0	6	21	14	1	1	0	0	0	0	0	0	0	0	0	23.7	27.3
1300	31	0	3	11	12	5	0	0	0	0	0	0	0	0	0	0	25.5	31.1
1400	72	1	4	31	31	5	0	0	0	0	0	0	0	0	0	0	24.6	27.9
1500	55	0	6	27	21	1	0	0	0	0	0	0	0	0	0	0	24	28.2
1600	69	0	6	36	26	1	0	0	0	0	0	0	0	0	0	0	23.6	27.2
1700	57	0	5	30	21	1	0	0	0	0	0	0	0	0	0	0	23.9	28
1800	39	0	1	21	12	5	0	0	0	0	0	0	0	0	0	0	24.8	27.6
1900	26	0	4	12	8	2	0	0	0	0	0	0	0	0	0	0	23.5	27.5
2000	8	0	1	0	7	0	0	0	0	0	0	0	0	0	0	0	26.4	-
2100	9	0	0	3	6	0	0	0	0	0	0	0	0	0	0	0	25.6	-
2200	9	0	1	4	4	0	0	0	0	0	0	0	0	0	0	0	23.5	-
2300	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	31.3	-
07-19	**679**	**3**	**71**	**327**	**247**	**30**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24**	**28.1**
06-22	**728**	**3**	**76**	**344**	**270**	**34**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.1**	**28.1**
06-00	**738**	**3**	**77**	**348**	**274**	**35**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.1**	**28.1**
00-00	**753**	**3**	**78**	**353**	**281**	**37**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**24.1**	**28.3**

Grand Total

Time	Total	Vbin 6 12	Vbin 12 19	Vbin 19 25	Vbin 25 31	Vbin 31 37	Vbin 37 43	Vbin 43 50	Vbin 50 56	Vbin 56 62	Vbin 62 68	Vbin 68 75	Vbin 75 81	Vbin 81 87	Vbin 87 93	Vbin 93 99	Mean	Vpp 85
--	5033	35	368	2293	2082	244	8	3	0	0	0	0	0	0	0	0	24.5	28.5

K&MTRAFFIC SURVEYS

SITE: PUMP LANE, RAINHAM LOCATION: ATTACHED TO TELEGRAPH PC

GRID REFERENCE: 51.375710, 0.596739 DIRECTION: SOUTHBOUND

	Fri	Sat	Sun	Mon	Tue	Wed	Thu
	13-Oct	14-Oct	15-Oct	16-Oct	17-Oct	18-Oct	19-Oct
Hour							
0000-0100	3	4	6	0	1	0	2
0100-0200	0	3	5	0	1	1	0
0200-0300	1	0	0	0	0	2	0
0300-0400	2	3	1	0	0	1	0
0400-0500	0	0	1	1	1	0	2
0500-0600	3	2	0	5	5	6	11
0600-0700	15	4	4	15	16	25	6
0700-0800	51	10	9	41	50	53	50
0800-0900	114	54	14	135	151	143	140
0900-1000	41	52	45	38	32	35	52
1000-1100	49	54	36	38	38	41	37
1100-1200	42	49	62	34	40	46	34
1200-1300	44	62	52	43	48	37	43
1300-1400	46	46	58	44	41	42	31
1400-1500	64	64	51	51	64	56	72
1500-1600	80	52	48	67	69	77	55
1600-1700	63	49	38	57	71	61	69
1700-1800	54	40	31	59	80	70	57
1800-1900	43	32	20	44	43	44	39
1900-2000	29	35	15	14	30	20	26
2000-2100	21	18	10	11	18	9	8
2100-2200	10	7	3	6	11	13	9
2200-2300	8	10	4	3	8	4	9
2300-2400	9	8	2	2	1	2	1
Totals							
0700-1900	691	564	464	651	727	705	679
0600-2200	766	628	496	697	802	772	728
0600-0000	783	646	502	702	811	778	738
0000-0000	792	658	515	708	819	788	753
AM Peak	800	1000	1100	800	800	800	800
	114	54	62	135	151	143	140
PM Peak	1500	1400	1300	1500	1700	1500	1400
	80	64	58	67	80	77	72

)LE

SPEED LIMIT: 30

Averages

1-5.	1-7.
1.2	2.3
0.4	1.4
0.6	0.4
0.6	1
0.8	0.7
6	4.6
15.4	12.1
49	37.7
136.6	107.3
39.6	42.1
40.6	41.9
39.2	43.9
43	47
40.8	44
61.4	60.3
69.6	64
64.2	58.3
64	55.9
42.6	37.9
23.8	24.1
13.4	13.6
9.8	8.4
6.4	6.6
3	3.6
690.6	640.1
753	698.4
762.4	708.6
772	719

APPENDIX
B

Key

- Site Location
- 5 Minute Cycle From The Site Accesses
- 10 Minute Cycle From The Site Accesses
- 20 Minute Cycle From The Site Accesses

0 0.75 1.5 3 Kilometers

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TITLE

Cycling distance from the site

CLIENT
Redrow Homes South East

PROJECT
Pump Lane

SCALE AT A3	DATE	JOB NO.	DRWG NO.
1:30,000	**Oct 2023**	**32275**	**G-02**

Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent ME14 3EN

t: 01622 776226
e: info@dhaplanning.co.uk
w: www.dhaplanning.co.uk

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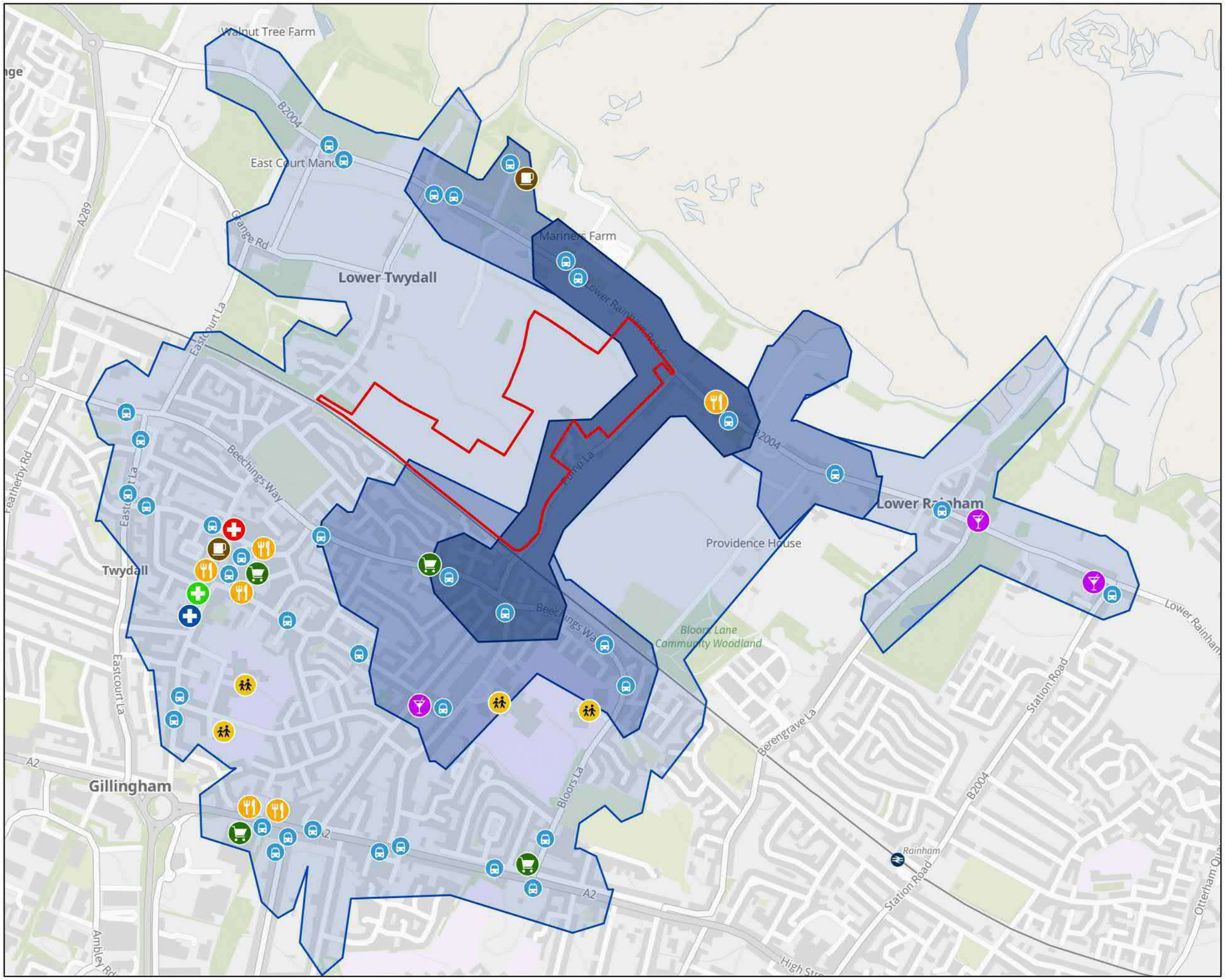
APPENDIX
C



Key

- Site Location
- 5 Minute Walk From The Site Accesses
- 10 Minute Walk From The Site Accesses
- 20 Minute Walk From The Site Accesses
- Grocery Store
- Cafe
- Pubs
- Resturant
- GP Surgeries
- Pharmacies
- Dentist Surgeries
- Schools
- Bus Stops

0 0.38 0.75 1.5 Kilometers

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TITLE

Facilities within walking distance of the site

CLIENT
Redrow Homes South East

PROJECT
Pump Lane

SCALE AT A3	DATE	JOB NO.	DRWG NO.
1:11,000	**Oct 2023**	**32275**	**G-01**

Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent ME14 3EN

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APPENDIX
D

Noise Constraint (train)

Key Views in/Out

Secondary access

Listed Building Buffer

Informal footpath

Development Area

Primary Access

Existing Trees

Proposed Trees

SUDS

Proposed Landscape Enhancement

Area allowed for BNG, POS, SUDS & Landscape buffering: 50% Total Site Area

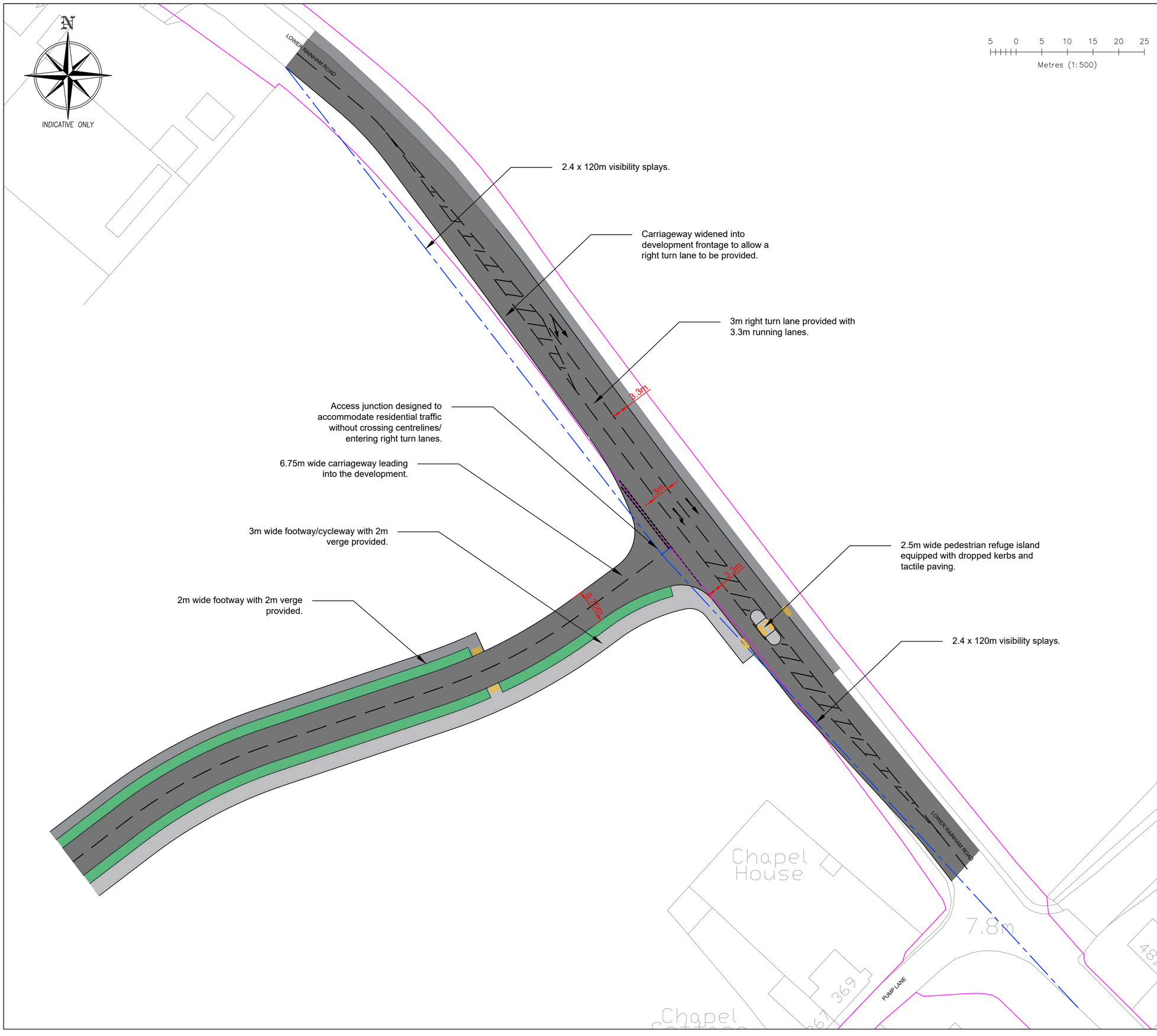
Land to the West of Pump Lane
Illustrative Masterplan

0 25 50 100

1:1250@A0

REDROW

APPENDIX
E


N
INDICATIVE ONLY
LOWER RAINHAM ROAD
5 0 5 10 15 20 25
Metres (1:500)
2.4 x 120m visibility splays.
Carriageway widened into development frontage to allow a right turn lane to be provided.
3m right turn lane provided with 3.3m running lanes.
Access junction designed to accommodate residential traffic without crossing centrelines/ entering right turn lanes.
6.75m wide carriageway leading into the development.
3m wide footway/cycleway with 2m verge provided.
2m wide footway with 2m verge provided.
2.5m wide pedestrian refuge island equipped with dropped kerbs and tactile paving.
2.4 x 120m visibility splays.
3.3m
3m
3.3m
6.75m
Chapel House
7.8m
PUMP LANE
LOWER RAINHAM ROAD

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- Drawing is based on OS data.
- Drawing is subject to a topographical survey and a stage 1 road safety audit.

REV	AMENDMENTS	DATE	CHK
P1	First issue	13.10.23	CS

Client

REDROW HOMES

Project

LAND AT PUMP LANE, RAINHAM

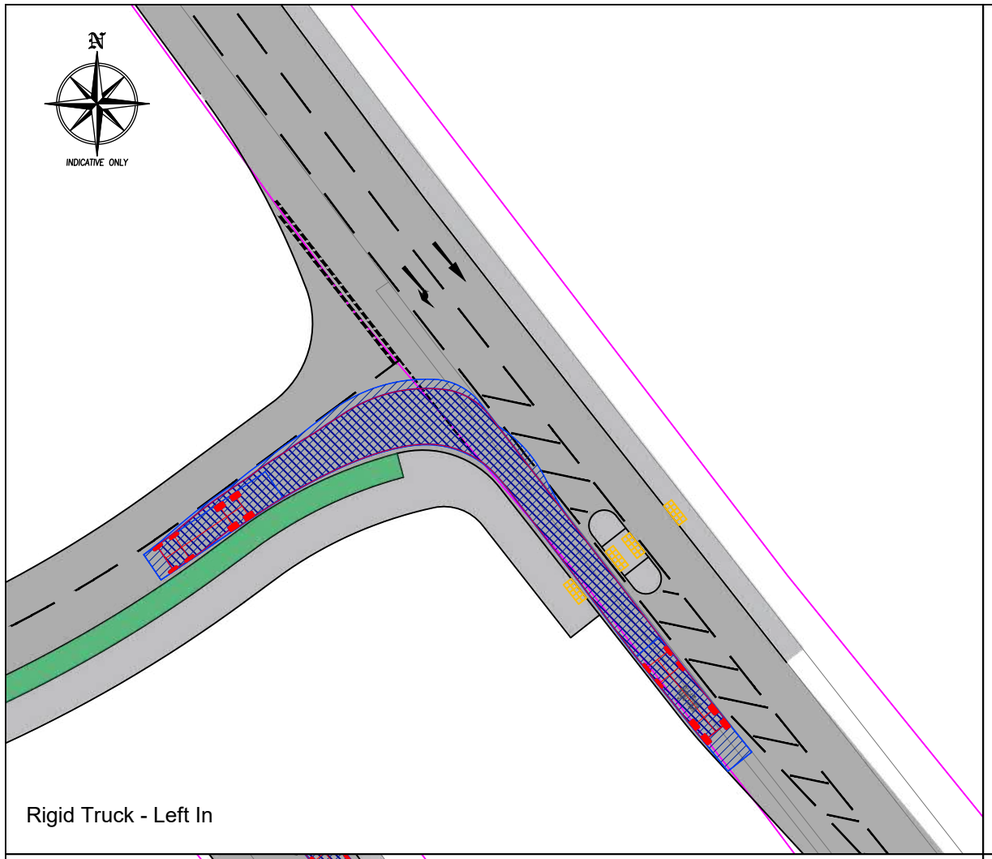
Title

PRIMARY ACCESS DESIGN OFF LOWER RAINHAM ROAD

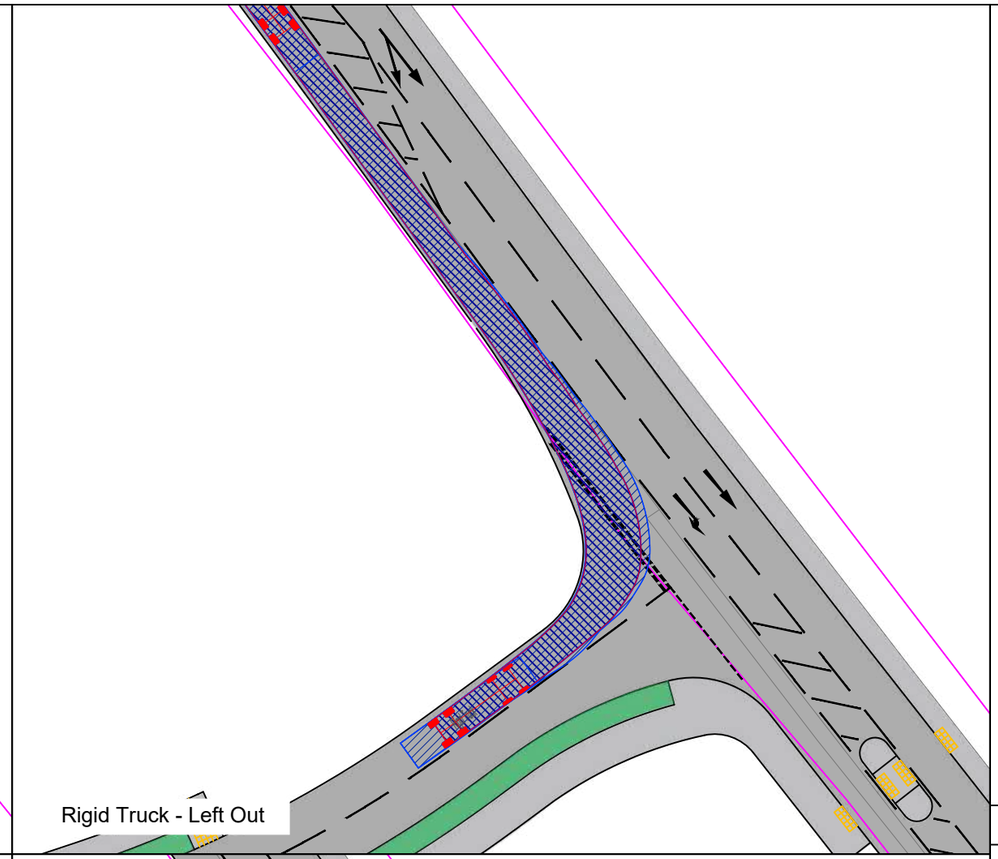
Drwg	Rev	Scale	Date
32275 - H-01	P1	1:500	13.10.23

Eclipse House, Eclipse Park. Sittingbourne Road
Maidstone, Kent. ME14 3EN
t: 01622 776226 f: 01622 776227
e: info@dhaplanning.co.uk w: www.dhaplanning.co.uk

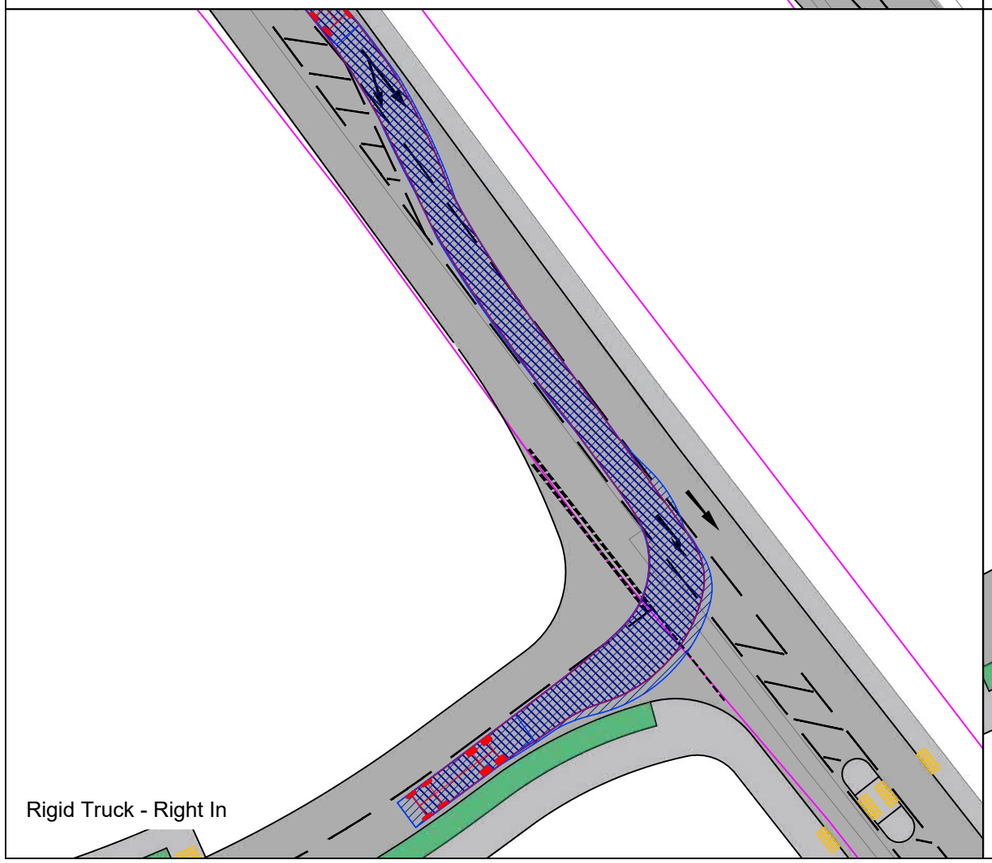
CAD Reference: A2



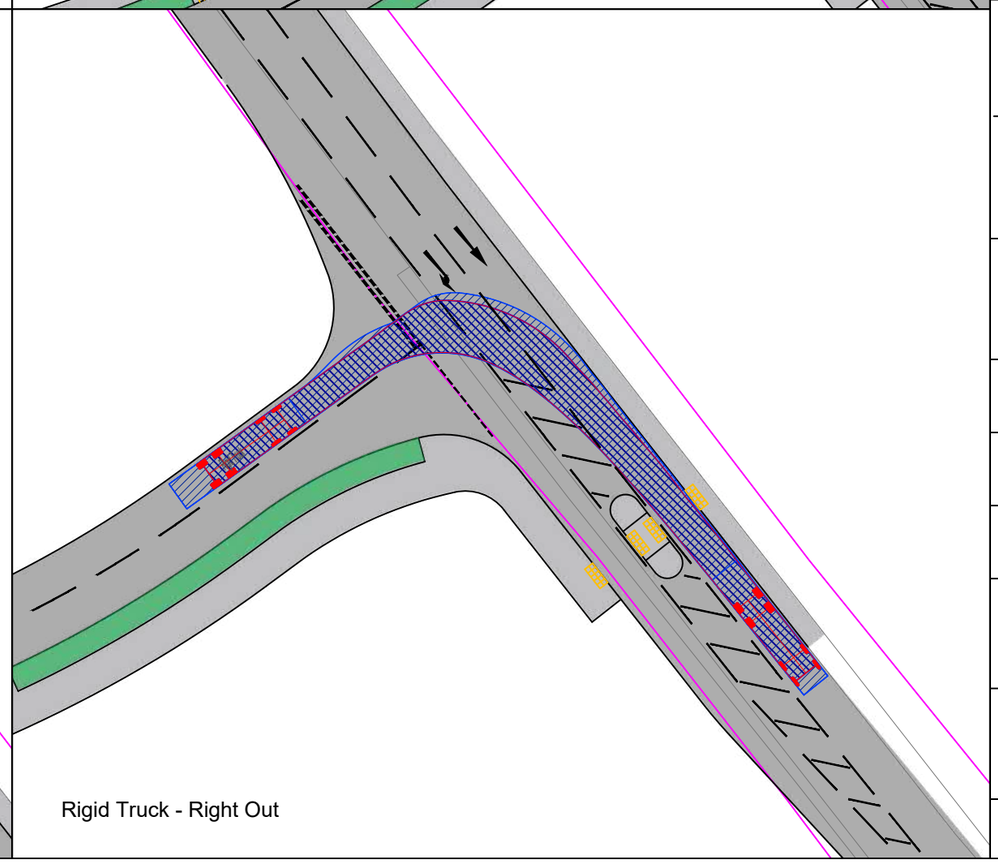
Rigid Truck - Left In



Rigid Truck - Left Out



Rigid Truck - Right In



Rigid Truck - Right Out

ONLY SCALE FOR PLANNING PURPOSES

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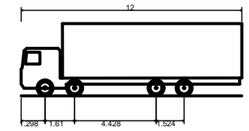

Rigid Truck	
Overall Length	12.000m
Overall Width	2.500m
Overall Body Height	3.928m
Min Body Ground Clearance	0.412m
Track Width	2.471m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	11.900m

REV	DATE	BY	DESCRIPTION	CHK	APD
P1	13.10.23	JM	First Issue	CS	CS

client

REDROW HOMES

project

LAND AT PUMP LANE, RAINHAM

title

VEHICLE SWEPT PATH ANALYSIS
PRIMARY ACCESS

project	drwg	rev
32775	T-01	P1

Drawn	Checked	Approved	scale @ A3	date
JM	CS	CS	1:500	13.10.23

status: FOR INFORMATION — P

Eclipse House, Eclipse Park. Sittingbourne Road
Maidstone, Kent. ME14 3EN
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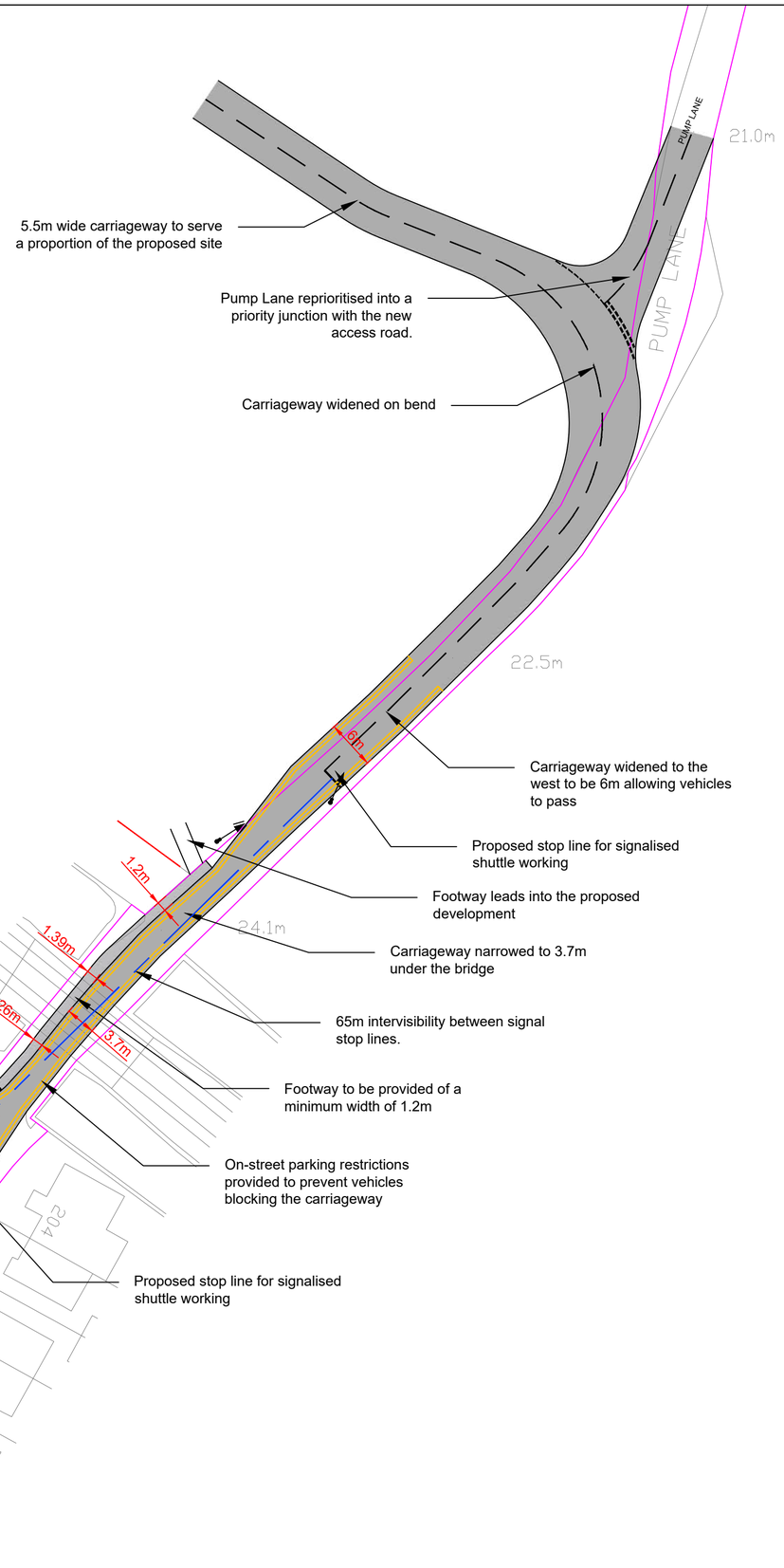
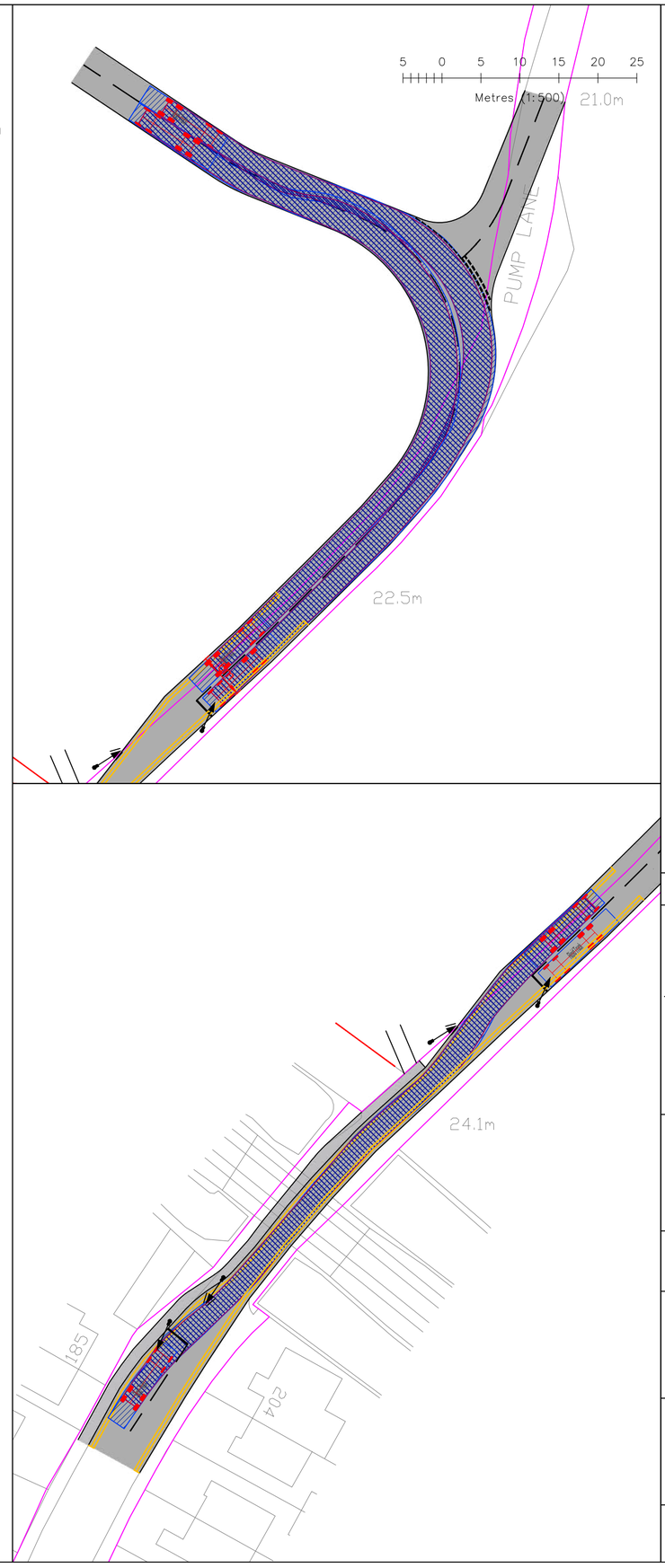
f: 01622 776227
e: info@dhaplanning.co.uk
w: www.dhaplanning.co.uk

CAD Reference: A3

APPENDIX
F


5.5m wide carriageway to serve a proportion of the proposed site
Pump Lane reprioritised into a priority junction with the new access road.
Carriageway widened on bend
Carriageway widened to the west to be 6m allowing vehicles to pass
Proposed stop line for signalised shuttle working
Footway leads into the proposed development
Carriageway narrowed to 3.7m under the bridge
65m intervisibility between signal stop lines.
Footway to be provided of a minimum width of 1.2m
On-street parking restrictions provided to prevent vehicles blocking the carriageway
Proposed stop line for signalised shuttle working
PUMP LANE
21.0m
22.5m
24.1m
26.5m
6m
1.2m
1.39m
1.26m
3.7m
1.2m
6.1m
1.5m
185
204
175



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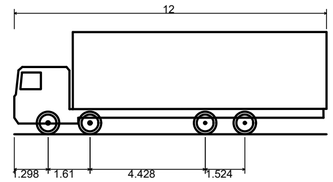

Rigid Truck	
Overall Length	12.000m
Overall Width	2.500m
Overall Body Height	3.928m
Min Body Ground Clearance	0.412m
Track Width	2.471m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	11.900m

REV	AMENDMENTS	DATE	CHK
P1	First issue	13.10.23	CS

Client

REDROW HOMES

Project

LAND AT PUMP LANE, RAINHAM

Title

SECONDARY ACCESS DESIGN OFF PUMP LANE

Drwg	Rev	Scale	Date
32275 - H-02	P1	1:500	13.10.23

Eclipse House, Eclipse Park. Sittingbourne Road
Maidstone, Kent. ME14 3EN
t: 01622 776226 f: 01622 776227
e: info@dhaplanning.co.uk w: www.dhaplanning.co.uk

CAD Reference: A2

APPENDIX
G

Calculation Reference: AUDIT-704001-231002-1009

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST		
	ES	EAST SUSSEX	2 days
	HC	HAMPSHIRE	2 days
	HF	HERTFORDSHIRE	1 days
	KC	KENT	3 days
	SC	SURREY	2 days
	WB	WEST BERKSHIRE	1 days
	WS	WEST SUSSEX	3 days
04	EAST ANGLIA		
	CA	CAMBRIDGESHIRE	1 days
	NF	NORFOLK	10 days
05	EAST MIDLANDS		
	DY	DERBY	1 days
06	WEST MIDLANDS		
	ST	STAFFORDSHIRE	1 days
11	SCOTLAND		
	AS	ABERDEENSHIRE	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
Actual Range: 105 to 537 (units:)
Range Selected by User: 100 to 600 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/15 to 29/06/23

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	8 days
Wednesday	10 days
Thursday	5 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	23 days
Directional ATC Count	5 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Edge of Town	22
Neighbourhood Centre (PPS6 Local Centre)	6

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	22
Village	5
Out of Town	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	10 days - Selected
Servicing vehicles Excluded	63 days - Selected

Secondary Filtering selection:

Use Class:

C3	28 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:
All Surveys Included

Secondary Filtering selection (Cont.):

Population within 1 mile:

1,001 to 5,000	8 days
5,001 to 10,000	9 days
10,001 to 15,000	7 days
15,001 to 20,000	2 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	7 days
25,001 to 50,000	6 days
50,001 to 75,000	3 days
75,001 to 100,000	3 days
100,001 to 125,000	1 days
125,001 to 250,000	8 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	3 days
1.1 to 1.5	21 days
1.6 to 2.0	4 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	21 days
No	7 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	28 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1 AS-03-A-02 MIXED HOUSES ABERDEENSHIRE
FARROCHIE ROAD
STONEHAVEN

Edge of Town
Residential Zone
Total No of Dwellings: 131
Survey date: WEDNESDAY *20/04/22* *Survey Type: MANUAL*

2 CA-03-A-06 MIXED HOUSES CAMBRIDGESHIRE
CRAFT'S WAY
NEAR CAMBRIDGE
BAR HILL
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 207
Survey date: FRIDAY *22/06/18* *Survey Type: MANUAL*

3 DY-03-A-01 MIXED HOUSES DERBY
RADBOURNE LANE
DERBY

Edge of Town
Residential Zone
Total No of Dwellings: 371
Survey date: TUESDAY *10/07/18* *Survey Type: MANUAL*

4 ES-03-A-03 MIXED HOUSES & FLATS EAST SUSSEX
SHEPHAM LANE
POLEGATE

Edge of Town
Residential Zone
Total No of Dwellings: 212
Survey date: MONDAY *11/07/16* *Survey Type: MANUAL*

5 ES-03-A-08 MIXED HOUSES & FLATS EAST SUSSEX
WRESTWOOD ROAD
BEXHILL

Edge of Town
Residential Zone
Total No of Dwellings: 110
Survey date: WEDNESDAY *12/10/22* *Survey Type: MANUAL*

6 HC-03-A-29 MIXED HOUSES & FLATS HAMPSHIRE
CROW LANE
RINGWOOD
CROW
Edge of Town
Residential Zone
Total No of Dwellings: 195
Survey date: THURSDAY *30/06/22* *Survey Type: MANUAL*

7 HC-03-A-32 MIXED HOUSES & FLATS HAMPSHIRE
GREEN LANE
FARNHAM
WEYBOURNE
Neighbourhood Centre (PPS6 Local Centre)
Residential Zone
Total No of Dwellings: 105
Survey date: THURSDAY *29/06/23* *Survey Type: MANUAL*

LIST OF SITES relevant to selection parameters (Cont.)

8 HF-03-A-03 MIXED HOUSES HERTFORDSHIRE
HARE STREET ROAD
BUNTINGFORD

Edge of Town
Residential Zone
Total No of Dwellings: 160
Survey date: MONDAY *08/07/19* *Survey Type: MANUAL*

9 KC-03-A-07 MIXED HOUSES KENT
RECULVER ROAD
HERNE BAY

Edge of Town
Residential Zone
Total No of Dwellings: 288
Survey date: WEDNESDAY *27/09/17* *Survey Type: MANUAL*

10 KC-03-A-08 MIXED HOUSES KENT
MAIDSTONE ROAD
CHARING

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 159
Survey date: TUESDAY *22/05/18* *Survey Type: MANUAL*

11 KC-03-A-10 MIXED HOUSES KENT
HEADCORN ROAD
STAPLEHURST

Edge of Town
Residential Zone
Total No of Dwellings: 106
Survey date: TUESDAY *09/05/23* *Survey Type: MANUAL*

12 NF-03-A-16 MIXED HOUSES & FLATS NORFOLK
NORWICH COMMON
WYMONDHAM

Edge of Town
Residential Zone
Total No of Dwellings: 138
Survey date: TUESDAY *20/10/15* *Survey Type: DIRECTIONAL ATC COUNT*

13 NF-03-A-23 MIXED HOUSES & FLATS NORFOLK
SILFIELD ROAD
WYMONDHAM

Edge of Town
Out of Town
Total No of Dwellings: 514
Survey date: WEDNESDAY *22/09/21* *Survey Type: MANUAL*

14 NF-03-A-31 MIXED HOUSES NORFOLK
BRANDON ROAD
SWAFFHAM

Edge of Town
Residential Zone
Total No of Dwellings: 321
Survey date: THURSDAY *22/09/22* *Survey Type: DIRECTIONAL ATC COUNT*

15 NF-03-A-32 MIXED HOUSES & FLATS NORFOLK
HUNSTANTON ROAD
HUNSTANTON

Edge of Town
Residential Zone
Total No of Dwellings: 164
Survey date: WEDNESDAY *21/09/22* *Survey Type: DIRECTIONAL ATC COUNT*

LIST OF SITES relevant to selection parameters (Cont.)

16 NF-03-A-33 MIXED HOUSES NORFOLK
LONDON ROAD
ATTLEBOROUGH

Edge of Town
Residential Zone
Total No of Dwellings: 143
Survey date: THURSDAY *29/09/22* *Survey Type: MANUAL*

17 NF-03-A-35 MIXED HOUSES & FLATS NORFOLK
REPTON AVENUE
NORWICH

Edge of Town
Residential Zone
Total No of Dwellings: 116
Survey date: WEDNESDAY *28/09/22* *Survey Type: MANUAL*

18 NF-03-A-38 MIXED HOUSES NORFOLK
BEAUFORT WAY
GREAT YARMOUTH
BRADWELL
Edge of Town
Residential Zone
Total No of Dwellings: 537
Survey date: TUESDAY *20/09/22* *Survey Type: MANUAL*

19 NF-03-A-39 MIXED HOUSES NORFOLK
HEATH DRIVE
HOLT

Edge of Town
Residential Zone
Total No of Dwellings: 212
Survey date: TUESDAY *27/09/22* *Survey Type: MANUAL*

20 NF-03-A-44 MIXED HOUSES NORFOLK
MILL LANE
NEAR NORWICH
HORSFORD
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 125
Survey date: WEDNESDAY *21/09/22* *Survey Type: DIRECTIONAL ATC COUNT*

21 NF-03-A-47 MIXED HOUSES & FLATS NORFOLK
BURGH ROAD
AYLSHAM

Edge of Town
Residential Zone
Total No of Dwellings: 300
Survey date: WEDNESDAY *21/09/22* *Survey Type: DIRECTIONAL ATC COUNT*

22 SC-03-A-05 MIXED HOUSES SURREY
REIGATE ROAD
HORLEY

Edge of Town
Residential Zone
Total No of Dwellings: 207
Survey date: MONDAY *01/04/19* *Survey Type: MANUAL*

LIST OF SITES relevant to selection parameters (Cont.)

23 SC-03-A-09 MIXED HOUSES & FLATS SURREY
AMLETS LANE
CRANLEIGH

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 136
Survey date: TUESDAY *24/05/22* *Survey Type: MANUAL*

24 ST-03-A-07 DETACHED & SEMI-DETACHED STAFFORDSHIRE
BEACONSIDE
STAFFORD
MARSTON GATE
Edge of Town
Residential Zone
Total No of Dwellings: 248
Survey date: WEDNESDAY *22/11/17* *Survey Type: MANUAL*

25 WB-03-A-03 MIXED HOUSES WEST BERKSHIRE
DORKING WAY
READING
CALCOT
Edge of Town
Residential Zone
Total No of Dwellings: 108
Survey date: FRIDAY *09/09/22* *Survey Type: MANUAL*

26 WS-03-A-08 MIXED HOUSES WEST SUSSEX
ROUNDSTONE LANE
ANGMERING

Edge of Town
Residential Zone
Total No of Dwellings: 180
Survey date: THURSDAY *19/04/18* *Survey Type: MANUAL*

27 WS-03-A-14 MIXED HOUSES WEST SUSSEX
TODDINGTON LANE
LITTLEHAMPTON
WICK
Edge of Town
Residential Zone
Total No of Dwellings: 117
Survey date: WEDNESDAY *20/10/21* *Survey Type: MANUAL*

28 WS-03-A-15 MIXED HOUSES WEST SUSSEX
HILLAND ROAD
BILLINGSHURST

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 380
Survey date: TUESDAY *23/11/21* *Survey Type: MANUAL*

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
HC-03-A-26	COVID
SF-03-A-10	COVID
WS-03-A-12	COVID
WS-03-A-13	COVID

MANUALLY DESELECTED SURVEYS

Site Ref	Survey Date	Reason for Deselection
DH-03-A-02	27/03/17	n/a
HC-03-A-28	08/11/21	n/a
KC-03-A-04	22/09/17	n/a
WS-03-A-18	15/05/23	n/a

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES			TOTALS		
Time Range	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	28	214	0.076	28	214	0.302	28	214	0.378
08:00 - 09:00	28	214	0.145	28	214	0.371	28	214	0.516
09:00 - 10:00	28	214	0.133	28	214	0.163	28	214	0.296
10:00 - 11:00	28	214	0.127	28	214	0.142	28	214	0.269
11:00 - 12:00	28	214	0.136	28	214	0.141	28	214	0.277
12:00 - 13:00	28	214	0.153	28	214	0.142	28	214	0.295
13:00 - 14:00	28	214	0.147	28	214	0.142	28	214	0.289
14:00 - 15:00	28	214	0.158	28	214	0.179	28	214	0.337
15:00 - 16:00	28	214	0.255	28	214	0.164	28	214	0.419
16:00 - 17:00	28	214	0.266	28	214	0.161	28	214	0.427
17:00 - 18:00	28	214	0.341	28	214	0.166	28	214	0.507
18:00 - 19:00	28	214	0.285	28	214	0.155	28	214	0.440
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.222			2.228			4.450

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:	105 - 537 (units:)
Survey date date range:	01/01/15 - 29/06/23
Number of weekdays (Monday-Friday):	32
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	37
Surveys manually removed from selection:	4

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Calculation Reference: AUDIT-704001-231004-1031

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : B - AFFORDABLE/LOCAL AUTHORITY HOUSES
TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST		
	EX	ESSEX	1 days
06	WEST MIDLANDS		
	WO	WORCESTERSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE		
	KS	KIRKLEES	2 days
08	NORTH WEST		
	AC	CHESHIRE WEST & CHESTER	1 days
	MS	MERSEYSIDE	1 days
09	NORTH		
	FU	WESTMORLAND & FURNESS	1 days
	NB	NORTHUMBERLAND	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
Actual Range: 16 to 228 (units:)
Range Selected by User: 11 to 516 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/10 to 13/05/22

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	2 days
Thursday	1 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	8 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Edge of Town	5
Neighbourhood Centre (PPS6 Local Centre)	3

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	6
Village	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	X days - Selected
Servicing vehicles Excluded	9 days - Selected

Secondary Filtering selection:

Use Class:

C3	8 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:
All Surveys Included

Secondary Filtering selection (Cont.):

Population within 1 mile:

1,001 to 5,000	3 days
5,001 to 10,000	2 days
10,001 to 15,000	1 days
15,001 to 20,000	1 days
25,001 to 50,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,000 or Less	1 days
5,001 to 25,000	1 days
50,001 to 75,000	1 days
75,001 to 100,000	1 days
125,001 to 250,000	4 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	4 days
1.1 to 1.5	4 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No	8 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	8 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1 AC-03-B-01 HOUSES & FLATS CHESHIRE WEST & CHESTER
WORDSWORTH CRES.
CHESTER
BLACON
Edge of Town
Residential Zone
Total No of Dwellings: 80
Survey date: MONDAY *17/11/14* *Survey Type: MANUAL*

2 EX-03-B-01 MIXED HOUSES & FLATS ESSEX
SHIMBROOKS
NEAR BRAINTREE
GREAT LEIGHS
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 228
Survey date: THURSDAY *10/05/18* *Survey Type: MANUAL*

3 FU-03-B-01 SEMI DETACHED & TERRACED WESTMORLAND & FURNESS
PENNINE WAY
ALSTON

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 66
Survey date: FRIDAY *13/05/22* *Survey Type: MANUAL*

4 KS-03-B-01 MIXED HOUSES KIRKLEES
WHITEACRE STREET
HUDDERSFIELD
DEIGHTON
Edge of Town
Residential Zone
Total No of Dwellings: 54
Survey date: TUESDAY *17/09/13* *Survey Type: MANUAL*

5 KS-03-B-02 TERRACED HOUSES KIRKLEES
SYKES CLOSE
BATLEY

Edge of Town
Residential Zone
Total No of Dwellings: 17
Survey date: FRIDAY *19/10/18* *Survey Type: MANUAL*

6 MS-03-B-01 TERRACED MERSEYSIDE
TARBOCK ROAD
LIVERPOOL
SPEKE
Edge of Town
Residential Zone
Total No of Dwellings: 16
Survey date: TUESDAY *18/06/13* *Survey Type: MANUAL*

7 NB-03-B-01 SEMI DET. & TERRACED NORTHUMBERLAND
WESTLEA
BEDLINGTON

Edge of Town
Residential Zone
Total No of Dwellings: 97
Survey date: MONDAY *19/11/12* *Survey Type: MANUAL*

8 WO-03-B-02 TERRACED HOUSES WORCESTERSHIRE
GOODREST WALK
WORCESTER
MERRIMANS HILL
Neighbourhood Centre (PPS6 Local Centre)
Residential Zone
Total No of Dwellings: 16
Survey date: MONDAY *14/11/16* *Survey Type: MANUAL*

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/B - AFFORDABLE/LOCAL AUTHORITY HOUSES
TOTAL VEHICLES
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES			TOTALS		
Time Range	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	8	72	0.059	8	72	0.195	8	72	0.254
08:00 - 09:00	8	72	0.108	8	72	0.249	8	72	0.357
09:00 - 10:00	8	72	0.111	8	72	0.178	8	72	0.289
10:00 - 11:00	8	72	0.106	8	72	0.129	8	72	0.235
11:00 - 12:00	8	72	0.108	8	72	0.125	8	72	0.233
12:00 - 13:00	8	72	0.146	8	72	0.106	8	72	0.252
13:00 - 14:00	8	72	0.122	8	72	0.106	8	72	0.228
14:00 - 15:00	8	72	0.150	8	72	0.132	8	72	0.282
15:00 - 16:00	8	72	0.159	8	72	0.131	8	72	0.290
16:00 - 17:00	8	72	0.206	8	72	0.105	8	72	0.311
17:00 - 18:00	8	72	0.197	8	72	0.127	8	72	0.324
18:00 - 19:00	8	72	0.179	8	72	0.113	8	72	0.292
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.651			1.696			3.347

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter summary

Trip rate parameter range selected:	16 - 228 (units:)
Survey date date range:	01/01/10 - 13/05/22
Number of weekdays (Monday-Friday):	8
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Medway Council – Reg. 18 Consultation

Site Promotion - Medway Telephone Exchange, Chatham

In addition to the sites assessed under the Land Availability Assessment Interim Report (September 2023), our client (Telereal Securitised Property GP Limited) would like to inform the Council that their land holding at the Medway Telephone Exchange, Best Street, Chatham, ME4 4AB, will become available for residential-led redevelopment during the Medway Local Plan 2040 plan period. As set out below, the site constitutes brownfield land in a sustainable development location, is under single ownership and expected to be surplus to operational requirements by 2028-2031.

Item	Commentary / Response
Agent	Christopher Schiele
Site Details	Medway Telephone Exchange Best Street CHATHAM ME4 4AB
Site Ownership	Telereal Securitised Property GP Limited (100%) ("our client")
Existing Use	Telephone Exchange (Sui Generis)
Site size	c. 0.54 ha
Relevant Planning History	A review of the Council's online planning register did not identify any planning applications relevant for a future redevelopment of the site.
Proposed Site Use	Residential (C3) Other uses not currently considered viable.
Site Availability	5-8 years
Is the site suitable for residential development?	No significant constraints affect the suitability of the site for residential-led redevelopment. The site is located in a sustainable development location, constitutes brownfield land and has excellent links to the strategic transport network (Chatham station, c.400m; local bus stops) and other social infrastructure, and is therefore in a suitable location for residential-led redevelopment.

	The site is in Flood Risk Zone 1 (with a low probability of flooding), neither locally nor statutorily listed, and not subject to any TPOs. The site's proximity to a number of heritage assets is noted and will need to be factored into any future redevelopment proposals. There are no known contamination constraints (which could not be overcome via a suitable remediation strategy). The site further has access to key utility services. Note: The site has not been subject to any active marketing at this stage.
Commentary and Reasons for Site Promotion (for inclusion in next iteration of the Medway Local Plan), including its achievability and availability	The site is subject to a strategic asset review undertaken by our client and expected to become available / surplus to BT's requirements by 2028-2031. Whilst located in close proximity to a number of heritage assets, it is our understanding that the site is neither statutorily / locally listed nor subject to any other significant designations or constraints which would affect its potential for future redevelopment. To date, no capacity testing has been undertaken. However, taking the existing scale/massing (and topography) of the Telephone Exchange into account as well as the key constraints and designations set out above, it is considered that approx. 80-150 new homes can realistically be delivered on this site, subject to detailed feasibility testing and depending on unit mix, tenures, height/massing, and layout. This assumes a flatted redevelopment which is considered acceptable given the site's location in the urban centre of Chatham. The site therefore has the potential to make a significant contribution to the Council's identified housing need of up to 29,000 homes (see Para. 5.12 of the Reg. 18 Local Plan).
Recommendation	The decision for the site to become available by 2028-2031 has been made following the Council's original Call for Sites in February 2023. However, given the ambitious housing targets Reg. 18 Local Plan, recent delivery rates in Medway Council, and the brownfield nature of the site in a sustainable development location, it is considered that the site can make a significant contribution to the Council's evidenced housing need over the Medway Local Plan 2040 plan-period. The fall-back position would be a vacant, unallocated former telephone exchange site which by 2028-2031 is no longer serving any meaningful purpose, resulting in a significantly underutilised brownfield site in a sustainable development location.

	As such, it is recommended to consider the site for inclusion in the emerging Medway Local Plan 2040 in the form of a Site Allocation for residential-led redevelopment. Our client is willing to cooperate with the Council in the next stages of the plan-making process to ensure a future site allocation meets both the Council's as well as our client's objectives and ambitions.
Site Location Plan	Title Plan provided as separate file.

Contact
Alex Christopher
[redacted]

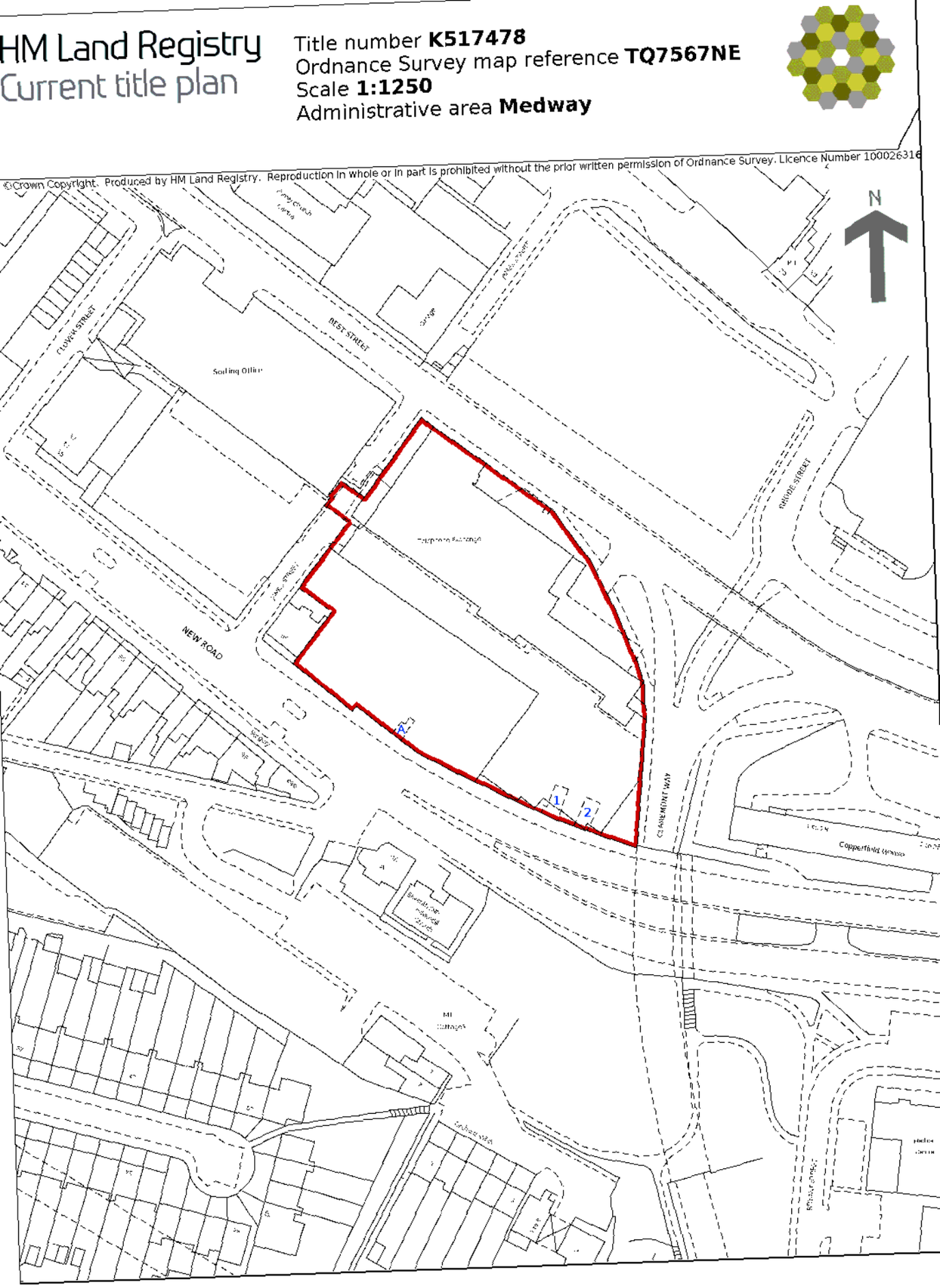
Christopher Schiele
[redacted]

31 October 2023

Turley

HM Land Registry
Current title plan

Title number **K517478**
Ordnance Survey map reference **TQ7567NE**
Scale **1:1250**
Administrative area **Medway**



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planning
transport
design
environment
infrastructure
land

MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

Medway Submission ID: 1506

Land to the rear of 143 Berengrave Lane, Rainham, Kent ME8 7UJ

CLIENT: Berengrave Lane LLP

October 2023
DHA/32343

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Appendix 1 – Sketch Site Plan [20.200]

1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

1.1.1 This representation has been prepared on behalf of Berengrave Lane LLP in response to Medway Council's *'Setting the direction for Medway 2040'* Regulation 18 Local Plan consultation 2023. The consultation is a statement of the Council's commitment in getting a new Local Plan in place for the period 2022-2040 and seeks to provide certainty in the direction for Medway's growth.

1.1.2 For the avoidance of doubt, this representation document relates to Medway online submission ID: **'1506'**.

1.1.3 The consultation document does not specify a preferred strategy for growth, rather provides options for growth set within the background of the identified housing requirement and the "Vision" and "Strategic Objectives" set by the Council. This representation is made within this context and responds to the following key questions:

1) *Do you have any comments about the proposed vision?*

2) *Do you have any comments about the proposed strategic objectives?*

3) *Do you have any comments about the considerations in developing the spatial strategy?*

4) *Do you have any comments about the interim Land Availability Assessment?*

1.1.4 In addition, this representation continues to promote the availability of our client's site 'Land to the rear of 143 Berengrave Lane, Rainham' for residential development allocation within the emerging Local Plan and sets out how the site would positively contribute to meeting the draft Plan's strategic objectives and is consistent with the spatial strategy for growth. For the reasons outlined within this representation, we submit that it is necessary for the spatial strategy for growth to draw upon all the spatial options in order to deliver the identified housing requirement in full.

1.1.5 Whilst the consultation document does not expressly invite comment on individual sites, it is highly pertinent to the consideration of the different spatial strategies to consider the suitability and deliverability of individual sites to ensure the Local Plan is deliverable and thus "sound" (NPPF, para 35).

1.1.6 For the avoidance of doubt, this representation document is intended to be read alongside the on-line form/platform submission which has been completed separately and refers to this document.

1.2 SUMMARY

1.2.1 As set out in full within this representation, the Local Plan must:

- Plan to meet its full objectively assessed need. The Council has persistently under delivered against its housing requirement over the last 36 years, resulting in a significant housing need, both market and affordable;

- Amend the "Vision" (para 3.1) to include reference to housing. Whilst the "Vision" is supported in principle, it is a fundamental omission that addressing the substantial shortfall in housing delivery within the local authority area is not expressly referenced within the vision. In not addressing the need to deliver housing as an integral part of the "Vision" the Plan fails to accord with the National Planning Policy Framework 2023 (NPPF) para 15, which requires Plans to provide a positive vision for the future of the area and including a framework for addressing inter alia, housing needs.

- Amend the "Strategic Objectives" to include the need to deliver housing to meet identified needs as an objective in its own right. The housing shortfall in Medway is significant and it is imperative that the new Plan is sufficiently ambitious in its strategy to ensure a robust and consistent supply of housing throughout the Plan period. This is necessary to accord with the NPPF (para 20) which requires the inclusion of strategic policies which set out the overall strategy and pattern for spatial growth, including for the provision of housing. The "Strategic Objectives" can therefore not be silent on this matter.

- Ensure that the identified supply of suitable housing sites is deliverable and reliable, with a strong supply of available sites deliverable within the early part of the Plan period. The supply should further include sufficient flexibility in the form of small and medium sized sites capable of sustaining housing delivery should strategic sites not deliver within the timeframes anticipated. Concerns are raised that the identified housing capacity of the respective housing pipelines identified are not accurate and/or are not deliverable within the Plan period.

1.3 STRUCTURE OF THE DOCUMENT

1.3.1 Below is an overview of the structure of the remainder of the consultation response:

- **Section 2** - Provides feedback on the overall vision of the Local Plan.

- **Section 3** - Provides commentary on the strategic objectives of the Local Plan.

- **Section 4** - Provides a response to the developing spatial strategy development needs of Medway, the housing supply position, pipeline development, windfall Supply and any other potential allocations.

- **Section 5** – Sets out the preferred spatial strategy and why this represents the most suitable and thus "Sound" option.

- **Section 6** – Provides an overview of the site promoted setting out the reasons why the site should be considered for an allocation.

- **Section 7** – Sets out the overall conclusions.

1.3.1 Each section includes a "summary" which forms the basis of our response on the on-line form/platform.

2 VISION

2.1 COMMENTS ON THE PROPOSED VISION

2.1.1 The "Vision" for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.

2.1.2 It is noted that the "Vision" seeks to provide more sustainable and resilient development, strengthen and enhance the character of Medway including supporting green infrastructure, create a healthy place in which to live and work and provide decent places to live for all sectors and ages of the community. It further highlights Medway as a leading economic player in the region where it can support the business space attracting new investment. Alongside development, there should also be the provision of improved travel choices and infrastructure provision.

2.1.3 However, the "Vision" is silent on its intention to meet its identified housing need. It is similarly silent on its intention of addressing economic/employment needs. Indeed, the overarching principles for the "Vision" fails to identify housing at all (para 3.1) as forming an important component of the Plan.

2.1.4 Whilst the "Vision" talks in general terms about how development is to be provided, central to the "Vision" must be "how much development is provided" as a matter that is fundamental to the framework for growth and spatial strategy as a determinative matter. This is a significant failing, considering the "Context" identifies "the supply of new homes is central to the Local Plan" (para 2.7).

2.1.5 NPPF (para 15) states that:

> *The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a* ***framework for addressing housing needs*** *and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*

2.1.6 In the absence of the "Vision" setting out its intention of how much development is to be delivered, specifically housing development, it does not provide a positive framework for addressing housing need contrary to the NPPF (para 15). This failing is further perpetrated by the "Strategic Objectives" (see Section 3 of this Statement), which also does not address the scale of housing provision that should be delivered, also contrary to the NPPF (para 20). This underlines the importance of the" Vision" setting out the intentions for growth.

2.1.7 The "Vision" as set out at para 3.1 must be amended as follows (new test in red):

> *The policies and growth strategy in the new Plan will deliver the vision for what we want to achieve for Medway by 2040. Our thoughts for what this vision could look like are set out below. The*

> *vision encompasses all aspects of policies in the new Local Plan, including housing, transport, environment, retail, employment and waste and minerals.*

2.1.8 Allied to this, a new paragraph must be added, or existing paragraphs amended as part of the "Vision" clearly setting out the intention of the Local Plan to meet identified housing and employment needs. The 7th paragraph (un-numbered) could be amended as follows:

> *The Plan will seek to deliver 28,500 new homes to ensure the needs of all sections and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction, and older properties have been retro-fitted to improve sustainability. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open spaces, has supported house building to provide a good quality of life for residents.*

2.18 The proposed change aligns with the "Development Needs" (para 5.4), which as set out in Section 4 of this statement the Plan must seek to deliver on.

2.19 The outline changes are essential to ensure the Plan is "Positively Prepared", "Consistent with National Policy" and therefore "Sound" (NPPF, para 35).

2.2 SUMMARY

2.2.1 Contrary to the requirements of the NPPF (para 15), the "Vision" fails to identify the provision of housing as in important component of the Plan (para 3.1) and does not set out how much development should be provided for. This is a central component of the Plan as a determinative matter for the spatial strategy. In not expressing the amount of development that is to be delivered, the Plan also fails to be positively prepared to provide a suitable framework for addressing housing needs. The "Vision" must be amended at para 3.1 to reference housing and the supporting text amended to include a commitment to the delivery of 28,500 new homes.

3 STRATEGIC OBJECTIVES

3.1 COMMENTS ON THE STRATEGIC OBJECTIVES

3.1.1 The consultation document sets out four strategic objectives to positively plan for the development and infrastructure needs of Medway whilst conserving and enhancing the natural, built and historic environment. The objectives are:

- Prepared from sustainable and green future;
- Supporting people to lead healthy lives and strengthen our communities;
- Securing jobs and developing skills for competitive economy; and
- Boost pride Medway through quality and resilient development.

3.1.2 As set out in the Plan (para 4.1), the objectives are to "*feed into the wording of policies and how sites and different locations are assessed for potential development*". It is therefore notable that there is no strategic objective dealing expressly with the amount of housing that needs to be delivered.

3.1.3 Whilst it is acknowledged that in general terms the objective of "Supporting People to Lead Healthy Lives and Strengthening Our Communities" mentions in general terms the types of housing to be delivered, it does not set out how much. This is a determining factor in deciding what is the most appropriate spatial strategy and should inform the basis of future strategic policies, as required by the NPPF (para 20 and 23). In accordance with the NPPF (para 11), this should also reflect as a minimum the objectively assessed need (28,500 new homes or 1,667 pa)

3.1.4 In the absence of clearly setting out what the housing requirement is and whether the Plan is looking to meet its need (which it should, see Section 4), the process of using the stated objectives to inform the Council's assessment of different sites and locations for development cannot be considered as "Positively Prepared" or "Justified", contrary to the NPPF (para 35).

3.1.5 The "Strategic Objectives" must therefore be either expanded to include the amount of housing that is to be planned for, which must reflect the objectively assessed need as a minimum (NPPF, para 11b) or a new objective added which identifies this.

3.1.6 With regards to the spatial objectives more generally, the general principles are supported. However, they further highlight the need for the amount of planned development to be expressed as an objective, since many of the other objectives are dependent on the delivery of housing including the ambitions for improved employment floorspace and higher value employment opportunities, which are also reliant on providing enough housing.

3.1.7 More generally, the objectives also only talk about development on brownfield land as part of its regeneration objectives. The objectives do not directly address the need to release greenfield land for development. This is misleading given the

release of greenfield sites is essential to meeting the objectives of the Plan and therefore must be referenced for clarity.

3.1.8 The consultation document (para 5.11) further mentions that "*the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs, following a request from the neighbouring authority".* Again, the strategic objectives are silent on this matter, and it must be clarified whether the Council intends the Plan to help address this need, as a matter which highly formative to the distribution of growth and selection of housing sites.

3.2 SUMMARY

3.2.1 The strategic objectives as currently drafted do not provide a "Sound" basis to inform the development strategy, site selection or future planning policies, where they fail to set out the amount of development that is to be planned for. This is fundamental to informing the spatial strategy and policy making, especially in respect of setting strategic policies (NPPF, para 20). The objectives must therefore either be expanded or a new objective added which sets out that the Plan seeks to deliver its full objectively assessed need as a minimum (NPPF, para 11b). Greenfield land must be released to aid the delivery of this.

4 DEVELOPING A SPATIAL STRATEGY

4.1 DEVELOPMENT NEEDS

4.1.1 The consultation document (para 5.3) sets out the development needs of Medway, identifying a current housing need of 1,667 homes pa or circa 28,500 over the Plan period (2022-2040). Para 5.4 of the consultation document casts doubt about whether this is an appropriate figure. However, it is considered essential that the Plan seeks to deliver development that meets Medway's objectively assessed need in full.

4.1.2 As evidenced in Table 3.1, the Council has consistently failed to deliver against its housing requirement since 1986, with it last meeting its requirement in only two years back in 2008/09 and 2009/10. This has no doubt lead to the current acute shortage of housing in Medway and current identified need. During this time the need for affordable housing has also become even more acute, with an identified annual need for 870 affordable homes pa (Medway Local Housing Needs Assessment, October 2021, prepared by Arc4).

4.1.3 The growing need for both market and affordable housing lends emphasis to the requirement for the Council to plan to meet its full objectively assessed need, as required by the NPPF (para 11b and para 23), supporting the Government's objectives to significant boost the supply of homes (NPPF, para 60).

Summary of Historic Housing Delivery in Medway			
Year	Completions	Requirement (at that time)	Difference
1986/87	1,118	1160	-42
1987/88	821	1160	-339
1988/89	1,454	1160	294
1989/90	1,467	1160	307
1990/91	391	1160	-769
1991/92	825	900	-75
1992/93	769	900	-131
1993/94	669	900	-231
1994/95	546	900	-354
1995/96	644	900	-256
1996/97	598	900	-302
1997/98	702	900	-198
1998/99	698	900	-202
1999/20	719	900	-181
2000/01	603	700	-97
2001/02	603	700	-97
2002/03	676	700	-24
2003/04	733	700	+33
2004/05	646	700	-54
2005/06	562	700	-138
2006/07	591	815	-224

2007/08	761	815	-54
2008/09	914	815	99
2009/10	972	815	157
2010/11	657	815	-158
2011/12	809	815	-6
2012/13	556	815	-259
2013/14	579	1000	-421
2014/15	483	1,000	-517
2015/16	553	1,000	-447
2016/17	642	1,000	-358
2017/18	680	1,334	-654
2018/19	647	1,683	-1,036
2019/20	1,130	1,662	-532
2020/21	1,087	1,586	-504
2021/22	1,102	1,657	-573
1986/87-2021/22	**27,407**	**35,727**	**-8,320**

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

4.1.4 It is noted that Gravesham Borough Council through its previous Regulation 18 consultation asked Medway to accommodate 2,000 homes to assist it in meeting its housing need. Therefore, it is even more pressing that the Council plans to meet its housing objective in full, since this could contribute to a worsening housing supply and affordability, if there is consistent under delivery of housing in this part of Kent (if Gravesham does not meet its needs). Medway Council should therefore work with Gravesham Borough Council to determine if it needs to and/or can accommodate any of its needs, to ensure the Plan is "Positively Prepared" (NPPF, para 35).

4.1.5 As a minimum, the objective to meet the objectively assessed need in full is supported, as required by National policy, with the Council to explore further whether it also needs to plan to meet any needs arising from Gravesham Borough Council or any other Council's (as appropriate) i.e Tonbridge & Malling, which also boarders Medway.

4.2 HOUSING SUPPLY

4.2.1 The consultation document sets out the need for 1,667 homes pa, equivalent to 28,312 homes up to 2040 (circa 28,500 homes). The below section reviews the potential pipeline supply of sites, with reference to the Land Availability Assessment (LAA), Interim Report, September 2023. Considering the supply of sites and their relative suitability and deliverability is highly relevant to the spatial strategy and potential preferred approach considered in Section 5.

Pipeline Development

4.2.2 A pipeline supply of sites with planning permission for 7,583 homes, of which 2,061 homes are under construction as of 31 March 2023 is identified.

4.2.3 Based on the level of information available, it is difficult to determine with any level of certainty whether the purported supply is reliable. However, we have concerns over double counting on several of the sites shown in Appendix C and D of the LAA around Strood waterfront, the urban edge of Strood North and Finsbury, Cliff Woods and Rainham as several of the sites identified in Appendix D have been delivering homes before the start of the identified plan period in 2022. The Council should make it clear through its future evidence base how units delivered before 2022 have not been counted towards the overall supply.

4.2.4 Furthermore, it cannot be assumed that each one of these sites will come forward or come forward in full. For instance, consents can lapse or the full development potential of a site may not be not achieved, for example, reserved matters consent is granted for fewer homes than consented under an Outline permission. Based on previous delivery rates, a discount rate must therefore be applied, allowing for an element of under-implementation. As such the full 7,583 homes cannot be relied upon as part of the spatial strategy.

Windfall Supply

4.2.5 Windfall development is defined at Annex 2 of the NPPF as sites not specifically identified in the Development Plan.

4.2.6 The NPPF (para 71) sets out that:

> *Where an allowance is to be made for windfall sites as part of anticipated supply, there should* ***be compelling evidence that they will provide a reliable source of supply****. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. (****Our emphasis****)*

4.2.7 The consultation document sets out that 3,000 homes will be delivered from windfall sites. The Council has published a Housing Delivery Test (HDT) Action Plan (July 2022) as it has not met the requirements of the HDT 2021. This action plan identifies the delivery of large/windfall dwellings which on average since 2012 have delivered 919 dwellings pa. This provides data on the historic delivery of windfall sites in Medway.

4.2.8 As acknowledged in the NPPF (para 71), the Council can refer to historic windfall delivery. However, this must be considered in the context that the Council has not had an up-to-date Local Plan for 20yrs. Most sites that have come forward are therefore not allocated and thus contribute to windfall provision. This significantly distorts the windfall delivery rate.

4.2.9 Whilst the data provided in the HDT Action Plan (July 2022) may on the face of it provide the justification for a higher windfall rate, it is unclear as to how exactly

the Council has arrived at a figure of 3,000 without an appropriate methodology being published. Through our experience, we are also aware that historically a high proportion of homes have come forward on brownfield windfall sites. The supply of such sites is not exhaustive, and it is noted that a significant number of brownfield sites are also identified in the "Urban Regeneration" spatial strategy. There is therefore a high potential for double counting (brownfield sites propping up windfall supply but are then also allocated).

4.2.10 The 3,000 dwellings given over to the windfall allowance therefore seem optimistically high, especially where this does not count towards the first five years of the supply. In the absence of any detailed evidence, it is considered that a more cautionary approach should be adopted until robust evidence can be provided in respect of projected windfalls.

4.2.11 At present, the Council do not have a compelling case to rely on the delivery of 3,000 homes and this should therefore be reduced.

Potential Allocations

4.2.12 The LAA identifies 447 sites across Medway that have the potential to supply 38,216 homes. This is above the housing requirement of the 28,312 homes (+ 9,904 homes). The sites can be broken down into four distinctive categories, which form the different spatial strategy options as follows:

- Urban regeneration;
- Suburban growth;
- Rural development; and
- Green Belt loss.

4.2.13 The remainder of this section analyses the capacity of each category for potential housing delivery identified in the LLA.

Urban Regeneration Sites

4.2.14 Map one of the consultation document provides an overview of the potential sites for urban regeneration across Strood, Chatham and Rochester encompassing small medium and large sites. The urban regeneration sites make up the second largest element of the potential supply, with the potential to deliver 11,151 homes.

4.2.15 We have significant concerns regarding the reliability of this supply on the basis:

- The development potential of many of the sites has been known about for some time, but they have failed to come forward, including within more economically buoyant times, because of issues of viability or technical constraints;

- Many sites have complex landownership/leasehold constraints and contamination concerns

- The requirement to provide BNG is likely to be a significant constraint to brownfield sites coming forward, especially smaller sites. Whilst on the face of it, many of these sites might seem ecologically sparse, they often harbour more interesting habitats, which under the DEFRA Metric 4 trading rules are very difficult to replace elsewhere. Brownfield sites are also likely to wholly rely on off-site BNG provision. This is either likely to prevent some sites from coming forward for reasons of viability (contributions for off-site provision are very high) or significantly reduce the development potential of some sites.

4.2.16 With the above concerns in mind, it is considered a conservative estimate that circa 3,500 dwellings of the sites within the urban regeneration category may not be deliverable in the proposed Plan period and based on previous urban regeneration delivery rates.

Suburban growth

4.2.17 Map two of the consultation document provides an overview of potential sites for Suburban Growth, with the potential to supply 9,680 homes. Several sites within this category are not considered suitable, such as:

- In Capstone and Darland in areas of local landscape importance/sensitivity adjacent to or in the Country Park or being sites of special nature conservation/local nature reserves;

- Sites on the southern boundary of Medway's administrative area with Maidstone Borough Council due long-standing concerns regarding deliverability due to issues of access and landownership, resulting in lapsed consents; and

4.2.18 Taking the above into account, it is considered at least 3,123 homes can be discounted from the potential supply of housing.

Rural Development

4.2.19 The consultation document sets out that through the LAA, that potentially 14,736 homes in the rural development strategy could come forward. The majority of the rural housing sites are on the Hoo Peninsula centred around the settlements of Chatterden, Cliffe, Cliffe Woods, Allhallows, Hoo St Werburgh High Hailstow, Lower Stoke and the Isle of Grain.

4.2.20 This is the single potential largest supply of housing. The following concerns are raised regarding many of the sites.

- The sites identified around the settlements of Allhallows, the Isle of Grain and Lower Stoke are within the periphery of Medway's administrative area with limited access to sustainable modes of transport and every-day

services to meet the needs of the existing and future residents of the settlement. Many of the sites proposed for development in these areas are large and propose a scale of development that is either disproportionate to the settlement and/or is unsustainably located with regard to the Council's strategic objectives;

- The peripheral sites around the northern edge of Cliffe Woods do not form logical extensions to the settlement in this Plan period given the existing pipeline of development to the south, west and north west of the settlement that have either been granted planning permission or have live planning applications submitted to the Council;

- Development whether it be for future employment, residential or mixed-use development on the Hoo Peninsula is reliant on the existing road network. Medway Council lost its Housing Infrastructure Funding (HIF) of £170 million in July 2023 to deliver the expansion of Hoo. In a statement on 11 July 2023 Medway Council stated that:

  "The loss of HIF today means we cannot fund and deliver the long needed all-important roads, public transport and environmental improvements ahead of new homes being built on the Hoo Peninsula."

  Consequently, the loss of HIF funding puts into question the sustainability and deliverability of the sites in and around Hoo. Whilst there is a scale of development interest here, amongst relatively few landholders which could secure the delivery of a significant proportion of growth, the infrastructure upgrades required to deliver that development will have to be developer funded. This will require close collaboration across a consortium of landowners and developers to secure this. The commercial realities of this, are that this will require significant commercial agreements across all parties to secure infrastructure delivery likely including the need for equalisation agreements. This additional layer of complexity, notwithstanding the infrastructure constraints. significantly reduces the ability of any development in Hoo to form a reliable part of the Council's housing land supply and therefore cannot be relied upon.

- Allied to the above, in the absence of infrastructure upgrades onto the peninsula, this further undermines the delivery of any expansion to the settlements at Lower Stoke, Allhallows and the Isle of Grain, which rely on the same infrastructure upgrades.

4.2.21 It is not fully known how development on the Hoo Peninsula will be impacted by the loss of the HIF funding. However, given the outlying nature of some of the other rural settlements on the peninsula such as Cliffe, Allhallows, Lower Stoke and the Isle of Grain a conservative estimate suggests a loss of a minimum of 3,327 homes from the potential supply before discounting of sites from the Hoo expansion (previously identified in the Hoo development framework).

Green Belt Loss

4.2.22 Just under 5% of land in Medway is designated as Green Belt. The areas of Green Belt form part of the London Metropolitan Green Belt and join land adjacent to Gravesham Borough Council and Tonbridge and Malling Borough Council. The Green Belt in Medway provides the strategic gap between Strood and Higham and between Snodland and Halling. The Council has identified the changing characteristics of the Green Belt due to the context of major infrastructure investment (the lower Thames crossing) as an opportunity for a limited number of homes in proximity to transport networks and services in Strood to be developed in the Green Belt providing new services as well as homes.

4.2.23 Where a site for potential Green Belt release conflicts with the five purposes of the Green Belt the site has been discounted from the supply although its contribution is limited.

4.3 SUMMARY

4.3.1 The overall development need figures are supported in principle, however, having reviewed the 447 sites identified in the LAA Stage 1 assessment, it is considered that from a potential supply of 38,216 homes, optimistically only 27,674 could be deliverable. See table 4.1 below. This is having regard to part delivery rates, known planning and infrastructure constraints, as well as considering whether the board location and scale of development proposed is suitable given the site's location. Due to the high-level nature of LAA a finer grain assessment of the suitability of the Site could not be undertaken. However, our assessment demonstrates that the potential supply as set out at para 5.16 cannot all be relied upon.

Category	Medway Potential Housing Capacity (From LAA)	DHA's view on Potential Housing Capacity (from LAA)	Difference in Supply
Urban Regeneration	11,151	7,651	3,500
Suburban Growth	9,680	6,157	3,123
Rural Development	14,736	11,229	3,147
Green Belt Loss	2,649	2,637	12
Total potential supply	**38,216**	**27,674**	**10,182**

TABLE 4.1 SUMMARY OF DHA ASSESSMENT OF MEDWAY'S POTENTIAL HOUSING SUPPLY

4.3.2 In addition, the windfall site allowance, at para 5.15 and Table 3.1, is optimistically high, and does not accurately reflect likely windfall provision going forward, taking into account the adoption of the Local Plan, allocation of new sites and other constraints to housing numbers such as BNG.

5 PREFERRED SPATIAL STRATEGY

5.1 PREFFERED SPATIAL STRATEGY

5.1.1 As is evident from Table 1 of the consultation document, no single development scenario in isolation supplies the quantum of homes required to meet the objectively assessed need, nor provides sufficient flexibility to ensure a robust and consistent supply of housing delivery throughout the Plan period.

5.1.2 Therefore, whilst the consultation document seeks comment on a preferred development option, in our view there cannot be one single development option for growth, rather a combination of a number or indeed all the suggested options will likely be required to ensure soundness of the Plan.

5.1.3 Notwithstanding the above, it is our client's view that "Suburban Expansion" must form one of the principal growth options within the forthcoming development plan. In order to ensure a robust and consistent delivery of housing throughout the Plan period, it is submitted that Suburban Expansion must form a necessary component of the future Plan's housing supply and by virtue of the generally unconstrained greenfield characteristics of suburban expansion location, these sites will likely form the primary source of deliverable housing supply early in the Plan period.

5.1.4 Whilst our client's preferred development option is "Suburban Expansion", in identifying the preferred option, we have also considered for completeness the relative opportunities and constraints of the other development options.

Option 1 - Urban Regeneration

5.1.5 Option 1 focuses on urban sites within Chatham, Strood and Rochester in and around the individual towns, high streets or on the waterfront of the River Medway.

5.1.6 For the reasons set out under section 4, significant concerns are raised regarding the deliverability of many of these sites. In principle, we do not raise an objection to the redevelopment of brownfield sites. However, these cannot form the only component of the housing land supply, owing to the inherent complexities and delays which are inevitably associated with the delivery of urban and brownfield sites. We therefore strongly suggest that a wider source of reliable housing sites, such as in the suburban areas are identified in order to ensure a deliverable source of housing early in the Plan period and which are capable of providing meaningful contributions of affordable housing and supporting infrastructure.

Option 2 - Suburban Expansion

5.1.7 Option 2 focuses on land around Gillingham, Rainham and the south of the administrative area in Capstone. Whilst we have raised concerns about several of the sites within this category coming forward, this is the preferred spatial strategy,

where in the main sites relate well to the existing urban area and form logical and sustainable extensions to the existing built envelope.

5.1.8 Most sites are greenfield sites and therefore in our experience are most likely to be deliverable over the Plan period, (especially within the first 5 years), and form a more reliable source of supply. They are also generally more likely to be able to secure community benefits and infrastructure, including much needed affordable housing, unlikely to be constrained by issues of viability, such as sites under Option 1.

Option 3 - Rural Development

5.1.9 Option 3 focuses development to the north of the administrative area on the Hoo Peninsula. For the reasons identified under Section 4. There are significant concerns over the deliverability and reliability of substantial development coming forward under this spatial option. Whilst it might be suitable allocated smaller sites to meet local housing needs, this spatial strategy cannot be relied upon to deliver the housing numbers purported in Table 1 of the consultation document and therefore would be expected to form a supporting component of supply to options 1 and 2.

Option 4 - Green Belt Release

5.1.10 Option 4 is shown as sites adjacent to the administrative areas of Gravesham Borough Council and includes land outside of the settlement of Strood and in the strategic gap between Halling (Medway Council) and Snodland (Tonbridge and Malling Borough Council). Proposed sites are located where neighbouring Councils are proposing urban extension or standalone new settlements to meet their housing need.

5.1.11 It is anticipated that Green Belt release will only form a small part of the potential supply and should not be relied upon to meet the housing need in full, where suitable alternatives exist, such as suburban extension.

5.2 SUMMARY

5.2.1 To meet the identified housing requirement in full and provide a robust and reliable source of consistent housing delivery throughout the plan period, sites will need to be allocated utilising several spatial strategy sources. However, our client's view is that the primary preferred spatial strategy option should comprise 'suburban expansion' in recognition of the generally unconstrained nature of such sites and in our experience a generally strong ability to provide affordable housing and supporting infrastructure contributions.

5.2.2 We suggest that the emerging Plan must allocated a pool of reliable, unconstrained greenfield sites, especially where sites exist close to settlement confines, that are capable of delivering housing early within the Plan period.

5.2.3 An overview of our client's available site at Land rear of Berengrave Lane, Rainham is provided in the following section, demonstrating how such a site would align with this growth strategy.

6 PROPOSED RESIDENTIAL SITE ALLOCATION

6.1 OVERVIEW OF ALLOCATION OPPORTUNITY

6.1.1 The submission site comprises a *circa*. 1.5ha greenfield site associated with the former Berengrave Nursery, which has since ceased active use and has already been partially re-developed for residential use.

FIGURE 6.1: AERIAL SUBMISSION SITE OVERVIEW (GOOGLE EARTH)

6.1.2 The site forms a logically contained development location, unconstrained by strategic planning designations, situated immediately adjacent to the Urban Area boundary and surrounded by residential development on three-sides. Whilst countryside, the submission site is inherently appreciated in an edge-of-urban-area context and forms a logical and highly sustainable suburban extension location north of Rainham, within close proximity to a range of day-to-day services and facilities including schools, shops and Rainham train station with frequent services to London, Medway Towns and the Kent Coast.

6.1.3 Land rear of Berengrave Nursery has already been demonstrated to form a reliable source of windfall residential development. In 2019, consent was granted for the development of nine new family homes and the scheme has since been completed (application ref: 'MC/18/3168').

6.1.4 In 2023, a second planning application was granted at appeal for the development of eight further new homes (appeal ref: 'APP/A2280/W/23/3316780') with the

Inspector concluding that the site formed a suitable location for housing and would not result in any wider adverse impact.

FIGURE 6.2: SITE PHOTOGRAPH SHOWING COMPLETED 'PHASE A' DWELLINGS AT BERENGRAVE LANE

6.1.5 This Local Plan submission seeks to promote the remaining rearmost portion of the site for residential allocation as part of the preferred growth strategy 'Suburban Extension' and will conclude the residential re-development of the site.

6.2 PROPOSED DEVELOPMENT

6.2.1 At this early stage, detailed plans have not yet been prepared and any future scheme would be subject to early and meaningful engagement with the local community and Medway Council. However, it is anticipated that the site has capacity to deliver approximately 32 new homes comprising a range of dwelling sizes and would be capable of delivering a policy compliant quantum of affordable housing, open/play space, private and public landscaping and parking.

6.2.2 To assist the Council, an indicative masterplan (**Appendix 1**) has been prepared for the to demonstrate how an appropriate residential development scheme could potentially be developed and would relate to the recently completed/consented development.

6.2.3 It is reiterated that our client has already delivered nine homes at land rear of Berengrave Lane and is preparing to implement the consented eight-dwelling appeal scheme in the short term. Our client is therefore highly familiar with the site and is well-placed to deliver the final phase of this development location early in the Plan-period.

FIGURE 6.3: INDICATIVE SITE PLAN SHOWING RESIDENTIAL DEVELOPMENT POTENTIAL (PREVIOUS CONSENTED APPLICATIONS 'MC/18/3168' & 'APP/ A2280/W/23/3316780' SHADED GREEN AND RED RESPECTIVELY).

6.3 SITE SPECIFIC JUSTIFICATION FOR ALLOCATION

Consistency with Spatial Growth Options

6.3.1 Development of the submission site would primarily be consistent with Spatial Growth Option (2) 'Suburban Expansion' and would contribute to the delivery of sustainably located new homes adjoining the existing urban areas of Medway, such as Rainham.

6.3.2 This spatial growth option is identified within the consultation document for its potential to deliver new housing in locations conducive to sustainable travel options and assist in achieving the concept of 15-minute neighbourhoods. Suburban expansion is additional identified to likely comprise primarily greenfield sites and which would be expected to be built out quickly, responding to market demand by virtue of their generally more limited site constraints than brownfield sites.

6.3.3 In this regard, land rear of Berengrave Lane comprises an unconstrained greenfield site capable of delivery in the short-term. The land is being promoted by a local SME housebuilder with an excellent track record of delivery, including on the wider submission site itself.

6.3.4 The submission site is located immediately adjacent to the existing built-up area and on the ground is appreciate in an edge-of-settlement context, surrounded by development on three sides. The site is further located within easy access to day-to-day services and facilities by sustainable travel modes and will contribute positively to the creation of sustainable and accessible neighbourhoods.

6.3.5 Land rear of Berengrave Lane is therefore clearly consistent with Spatial Growth Option (2) which we suggest should form one of the primary growth options to deliver the development needs of the district across the Plan period.

6.3.6 Sites that are relatively un-constrained and already characterised by their proximity and character adjacent to existing settlements are therefore a favourable location for the significant growth that is required and have the least impact on the assets to which the Council are rightly seeking to conserve.

6.3.7 Such sites are in our experience, a reliable source of housing delivery, capable of providing a steady and sustained source of housing throughout the life of the Plan and typically contribute strongly to the supply of affordable housing and supporting financial contributions for the district.

6.3.8 Given the clear consistency of our client's site with the preferred growth strategy and the established nature of the wider site as a suitable location for housing, we submit that land rear of Berengrave Lane should be allocated with capacity for *circa.* 32 new homes within the emerging Local Plan.

Sustainability

6.3.9 Development on this site would contribute to the achievement of sustainable development for the array of reasons set out within the chapters of this representation.

6.3.10 An economic role includes contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. In this respect, the site is suitable, sustainable, available and deliverable for development, and would help contribute to Medway's housing need for the Plan period with the provision of a medium-scale contribution of high-quality new homes of a mix of dwelling sizes. Household expenditure generated by future residents would support economic activity locally and development would also enable the Council and local community to benefit from revenue linked to requested Section 106 contributions.

6.3.11 From a social perspective, residential development would cater for the provision of housing in a sustainable location already surrounded by housing and supporting infrastructure. For the reasons set out in earlier chapters, greenfield and Green Belt release is inevitably required to meet the housing need. The development of well-contained, relatively unconstrained greenfield sites, already strongly characterised by their location within the built envelope of existing settlements, would help avoid the need for more significant large-scale greenfield site releases in more sensitive landscapes that would have a greater level of impact and harm.

6.3.12 Likewise, the site has the potential to provide for a range of dwellings that would meet the district need, could provide for a mix of both market and affordable and smaller and larger family units which will help maintain a balanced community within Rainham.

6.3.13 From an environmental perspective, it is acknowledged that the allocation would result in development of a greenfield site. However, it is clear that the housing

need in Medway cannot be met by a dwindling supply of urban sites and greenfield development is inevitably required. The development of an underutilised greenfield site sustainably located adjacent to the urban area close to services, facilities and public transport connections and at an appropriate and effective density is considered a preferable location in the context of sustainability objectives and simultaneously will make a modest contribution to reducing the need to develop into wider, more ecologically valuable and visually sensitive sites in the countryside.

6.3.14 From a wider sustainability perspective, the proposal would not involve the loss of land that is of high agricultural or ecological value and would not comprise development in an area of high flood risk.

Ecology

6.3.15 From an ecological perspective, the site is not subject to any specific designations and both previous consented schemes have demonstrated that development of the site can ben delivered without incurring any adverse ecological harm. To the contrary, the residential development of the site which will incorporate landscaping and open space provides opportunities for the ecological enhancement of the site and delivery of at least 10% biodiversity net gain.

Landscape

6.3.16 The submission site comprises a naturally well-contained land parcel, characterised by its edge-of-settlement context and surrounded on three sides by built form and robust structural landscaping. Any future scheme would be reasonably expected to include additional landscaping and ecological enhancement measures.

6.3.17 As has already been established by way of the two previous consents on the site, development at land rear of Berengrave Lane, whilst not widely visible from the wider countryside, can be delivered whilst conserving the local sense of place, reflecting the character of surrounding existing and new residential development on Berengrave Lane and providing localised visual interest through a high quality and distinctive architectural design, material palette and site landscaping.

Heritage

6.3.18 The submission site is not located in close proximity to any heritage assets or Conservation Areas, nor is the site identified to be of any particular archaeological importance. There is therefore no basis upon which to resist growth in this location from a heritage perspective.

Residential Amenity

6.3.19 By virtue of the site layout, separation distances and landscaping that would be incorporated between proposed and existing properties, it is unlikely that the scheme would result in any adverse impacts on the amenity of nearby properties.

6.3.20 In terms of vehicle movements, the scale of the proposed development for allocation is such that the number of anticipated vehicle movements will be

relatively minimal and certainly not to a degree that would significantly harm neighbouring amenity.

Flood Risk

6.3.21 The submission site lies entirely within Flood Zone 1 with no known risk of flooding. Likewise, the landowner is not aware of any local flood incidents that have impacted this area of Rainham. There is therefore no basis upon which to resist growth in this location from a flood risk perspective.

Access and Highways

6.3.22 Access design and improvements if required remain at an early stage and details have not yet been finalised. However, at this early stage no absolute constraints with regards to access are anticipated and it is considered that suitable and safe access to serve the modelled capacity can be achieved.

6.3.23 Work by the project team on this site remains ongoing and it is expected that additional information will be provided as the emerging Local Plan progresses.

Deliverability

6.3.24 The site has recently been subject to two recent planning applications, both prepared by our client and both of which have now received approval. The first scheme has been delivered, whilst the second is understood to be implemented shortly.

6.3.25 Our client is therefore highly familiar with the site and there are not considered to be any impediments to the site being identified for potential development commencing within the 0-5 years of the Plan period. Combined with an appropriate scale and number of wider allocations in Medway, this would assist in ensuring a steady delivery of housing in Medway across the majority of the Plan period.

6.3.26 For the reasons set out in this Statement the site is considered suitable for medium scale residential development. The site is adjacent to the urban area of Rainham and would form a natural and logical development north of the settlement with excellent accessibility to day-to-day services and amenities via active travel modes within Rainham itself and convenient access to public transport infrastructure for onward travel to the wider Medway towns.

6.3.27 Residential development would make a significant contribution to the housing land supply for the district, for both market and local needs affordable housing.

6.3.28 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.3.29 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality residential development scheme of market and affordable housing

that is capable of contributing to a range of community facilities and services locally.

6.3.30 The site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the Plan period. The site is therefore considered available and achievable for the purposes of the tests of deliverability.

6.4 SUMMARY

6.4.1 Land rear of Berengrave Lane is demonstrated to be consistent with Spatial Growth Option (2), which we suggest should form one of the primary growth options to deliver the development needs of the district across the Plan period.

6.4.2 For the reasons set out in this Statement, the site is considered suitable for medium scale residential development. The site is adjacent to the urban area of Rainham and would form a natural and logical development north of the settlement with excellent accessibility to day-to-day services and amenities via active travel modes within Rainham itself and convenient access to public transport infrastructure for onward travel to the wider Medway towns.

6.4.3 Residential development would make a significant contribution to the housing land supply for the district, for both market and local needs affordable housing.

6.4.4 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

6.4.5 Given the clear consistency of our client's site with the preferred growth strategy and the established nature of the wider site as a suitable location for housing, we submit that land rear of Berengrave Lane should be allocated with capacity for *circa*. 32 new homes within the emerging Local Plan.

7 CONCLUSION

7.1 OVERALL SUMMARY

7.1.1 This representation has been prepared on behalf of Berengrave Lane LLP in response to Medway Council's 'Setting the direction for Medway 2040' Regulation 18 Local Plan consultation 2023. The consultation is a statement of the Council's commitment in getting a new Local Plan in place for the period 2022-2040 and seeks to provide certainty in the direction for Medway's growth.

7.1.2 Our client controls 'Land rear of 143 Berengrave Lane, Rainham' and is promoting the site for residential allocation as part of the emerging Local Plan process.

7.1.3 Given the clear consistency of our client's site with the preferred growth strategy and the established nature of the wider site as a suitable location for housing, we submit that land rear of 143 Berengrave Lane, Rainham should be allocated with capacity for *circa*. 32 new homes within the emerging Local Plan.

7.1.4 Taking all of the above into consideration, we consider that the land promoted rear of Berengrave Lane should be included as a future housing allocation and continue to form part of the Council's housing evidence base used to inform the emerging Local Plan.

7.1.5 In addition to being sustainable, the site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present and there are no impediments to the site being allocated for development commencing within the initial 0-5 year phase of the Plan period.

APPENDIX
1

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0 10 30 50 100m

Sketch Site Plan
Land to the Rear of 143 Berengrave Lane, Rainham, Kent, ME8 7UJ

N

Affordable Units
Built houses
Permitted houses (soon to be built)

Revision Note & Date

Rev	Date	Note	Initial

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Project Title
Land to the Rear of 143 Berengrave Lane,
Rainham, Kent, ME8 7UJ

Client Details
Berengrave Lane LLP

Drawing Title
Sketch Site Plan

BIM Number

Scale	Date	Drawn	Checked
1:500@A1	Oct 2023	LH	JR

Drawing Status

Project Number	Drawing Number	Drawing Revision
20.200	SK003	0

planning
transport
design
environment
infrastructure
land

MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

CHATHAM INTERFACE SITES

REGULATION 18 SUBMISSION ID: ID 1549

LAA REF: CCB25 and CCB35

CLIENT: COUNTRYSIDE PARTNERSHIPS

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1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

1.1.1 These representations have been prepared on behalf of Countryside Partnerships in response to Medway Council's *'Setting the direction for Medway 2040'* Regulation 18 Local Plan consultation 2023 for Sites References CCB25 and CCB35 known as 'Chatham Interface'. The consultation is a statement of the Council's commitment in getting a new Local Plan in place for the period 2022-2040 (18 yrs.) and seeks to provide certainty in the direction for Medway's growth.

1.1.2 The consultation document is very high level and does not include any preferred strategy for growth but provides options for growth set within the background of the identified housing requirement, the "Vision" and "Strategic Objectives" set by the Council. These representations are made within this context and answer the following key questions:

1) Do you have any comments about the proposed vision?

2) Do you have any comments about the proposed strategic objectives?

3) Do you have any comments about the considerations in developing the spatial strategy?

4) Do you have any comments about the interim Land Availability Assessment?

1.1.3 In answering the above questions, it has been further demonstrated how the Chatham Interface (Site Refs CCB 25 and CCB 35) at the Historic Dockyard Chatham would continue to provide an appropriate location as an Allocated Site in the emerging Local Plan to provide for residential led mixed use development through urban regeneration positively contribute to meeting the strategic objectives of the Local Plan its spatial strategy for growth, which for the reasons we outline must draw on all the spatial options to deliver the identified housing requirement. Whilst the consultation document does not expressly invite comment on individual sites, it is highly pertinent to the consideration of the different spatial strategies to consider the suitability and deliverability of individual sites to ensure the Local Plan is deliverable and thus "Sound" (NPPF, para 35).

1.1.4 These representations must be read alongside the on-line form/platform which has been completed.

1.2 SUMMARY

1.2.1 As set out in full in these representations, the Local Plan must:

- Plan to meet its full objectively assessed need. The Council has persistently under delivered against its housing requirement over the last 36 yrs., resulting in a significant housing need, both market and affordable;
- Amend the "Vision" (para 3.1) to include reference to housing. Whilst the "Vision" in general is supported, it is a significant failing that it does not mention the delivery housing a significant element of the Plan. In not addressing the need to deliver housing as an integral part of the "Vision" it fails to accord with the NPPF (para 15);
- Amend the "Strategic Objectives" to include as an objective on its own the need to deliver housing to meet identified needs. This is necessary to accord with the NPPF (para 20) requires the inclusion of strategic policies which set out the overall strategy and pattern for spatial growth, including for the provision of housing. The "Strategic Objectives" can therefore not be silent on this matter.
- Ensure the potential supply of housing identified is deliverable and reliable, especially within the early part of the Plan period. Concerns are raised that the identified housing capacity of the respective housing pipelines identified are not accurate and/or are not deliverable within the Plan period.

1.3 STRUCTURE OF THE DOCUMENT

1.3.1 Below is an overview of the structure of the remainder of the consultation response:

- **Chapter 2** - Provides feedback on the overall vision of the Local Plan;
- **Chapter 3** - Provides commentary on the strategic objectives of the Local Plan;
- **Chapter 4** - Provides a response to the developing spatial strategy development needs of Medway, the housing supply position, pipeline development, windfall Supply and any other potential allocations;
- **Chapter 5** - Provides an overview of the sites promoted (Chatham Interface Site Refs CCB25 and CCB35) setting out the reasons why the sites should continue to be allocated for residential lead development;

- **Chapter 6** - Sets out the preferred spatial strategy and why this represents the most suitable and thus "Sound" option.
- **Chapter 7** - Provides additional commentary on the land availability assessment; and
- **Chapter 8** - Sets out the overall conclusions.

1.3.1 Each section includes a "summary" which forms the basis of our response on the on-line form/platform.

2 VISION

2.1 COMMENTS ON THE PROPOSED VISION

2.1.1 The "Vision" for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.

2.1.2 It is noted that the "Vision" seeks to provide more sustainable and resilient development, strengthen and enhance the character of Medway including supporting green infrastructure, create a healthy place in which to live and work and provide decent places to live for all sectors and ages of the community. It further highlights Medway as a leading economic player in the region where it can support the business space attracting new investment. Alongside development, there should also be the provision of improved travel choices and infrastructure provision.

2.1.3 However, the "Vision" is silent on its intention to meet its identified housing need. It is similarly silent on its intention of addressing economic/employment needs. Indeed, the overarching principles for the "Vision" fails to identify housing at all (para 3.1) as forming an important component of the Plan.

2.1.4 Whilst the "Vision" talks in general terms about how development is to be provided, central to the "Vision" must be "how much development is provided" as a matter that is fundamental to the framework for growth and spatial strategy as a determinative matter. This is a significant failing, considering the "Context" identifies "the supply of new homes is central to the Local Plan" (para 2.7).

2.1.5 NPPF (para 15) states that:

> *The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a* ***framework for addressing housing needs*** *and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*

2.1.6 In the absence of the "Vision" setting out its intention of how much development is to be delivered, specifically housing development, it does not provide a positive framework for addressing housing need contrary to the NPPF (para 15). This failing is further perpetrated by the "Strategic Objectives" (see Section 3 of this Statement), which also does not address the scale of housing provision that should be delivered, also contrary to the NPPF (para 20). This underlines the importance of the" Vision" setting out the intentions for growth.

2.1.7 The "Vision" as set out at para 3.1 must be amended as follows (new test in red):

> *The policies and growth strategy in the new Plan will deliver the vision for what we want to achieve for Medway by 2040. Our thoughts for what this vision could look like are set out below. The vision encompasses all aspects of policies in the new Local Plan, including housing, transport, environment, retail, employment and waste and minerals.*

2.1.8 Allied to this, a new paragraph must be added, or existing paragraphs amended as part of the "Vision" clearly setting out the intention of the Local Plan to meet identified housing and employment needs. The 7th paragraph (un-numbered) could be amended as follows:

> *The Plan will seek to deliver 28,500 new homes to ensure the needs of all sections and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction, and older properties have been retro-fitted to improve sustainability. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open spaces, has supported house building to provide a good quality of life for residents.*

2.18 The proposed change aligns with the "Development Needs" (para 5.4), which as set out in Section 4 of this statement the Plan must seek to deliver on.

2.19 The outline changes are essential to ensure the Plan is "Positively Prepared", "Consistent with National Policy" and therefore "Sound" (NPPF, para 35)

2.2 SUMMARY

2.2.1 Contrary to the requirements of the NPPF (para 15), the "Vision" fails to identify the provision of housing and employment as an important component of the Plan (para 3.1) and does not set out how much development should be provided for. This is a central component of the Plan as a determinative matter for the spatial strategy. In not expressing the amount of development that is to be delivered in relation to housing and new employment, the Plan also fails to be positively prepared to provide a suitable framework for addressing housing and employment needs. The "Vision" must be amended at para 3.1 to reference housing and employment provision and the supporting text amended to include reference to the delivery of circa 28,500 new homes.

3 STRATEGIC OBJECTIVES

3.1 COMMENTS ON THE STRATEGIC OBJECTIVES

3.1.1 The consultation document sets out four strategic objectives to positively plan for the development and infrastructure needs of Medway whilst conserving and enhancing the natural, built and historic environment. The objectives are:

- Prepared from sustainable and green future;
- Supporting people to lead healthy lives and strengthen our communities;
- Securing jobs and developing skills for competitive economy; and
- Boost pride in Medway through quality and resilient development.

3.1.2 As set out in the Plan (para 4.1), the objectives are to "*feed into the wording of policies and how sites and different locations are assessed for potential development*". It is therefore notable that there is no strategic objective dealing expressly with the amount of housing that needs to be delivered.

3.1.3 Whilst it is acknowledged that in general terms the objective of "Supporting People to Lead Healthy Lives and Strengthening Our Communities" mentions in general terms the types of housing to be delivered, it does not set out how much. This is a determining factor in deciding what is the most appropriate spatial strategy and should inform the basis of future strategic policies, as required by the NPPF (para 20 and 23). In accordance with the NPPF (para 11), this should also reflect as a minimum the objectively assessed need (28,500 new homes or 1,667 pa)

3.1.4 In the absence of clearly setting out what the housing requirement is and whether the Plan is looking to meet its need (which it should, see Section 4), the process of using the stated objectives to inform the Council's assessment of different sites and locations for development cannot be considered as "Positively Prepared" or "Justified", contrary to the NPPF (para 35).

3.1.5 The "Strategic Objectives" must therefore be either expanded to include the amount of housing that is to be planned for, which must reflect the objectively assessed need as a minimum (NPPF, para 11b) or a new objective should be added to identify this.

3.1.6 With regards to the spatial objectives more generally, the general principles are supported. However, there remains a need for an objective to be expressed in relation to the amount of development (housing and employment) to be planned , since many of the other objectives are dependent on the delivery of housing

including the ambitions for improved employment floorspace and higher value employment opportunities, which are also reliant on providing sufficient housing.

3.1.7 Objective 4 proposes development on brownfield land subsequently seeking to Boost Pride in Medway through quality and resilient development. The development on brownfield land is supported in NPPF (para 119) which sets out "a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land". Whilst this is supported, it is also understood that the objectives do not directly address the need to release brownfield land for urban regeneration as part of a combined strategy for meeting the housing needs of Medway, which also include suburban expansion, rural development and Green Belt release. The objective is, therefore, misleading appearing to read that urban regeneration is the only objective rather than part of a wider objective for Medway to meet housing needs through the emerging Local Plan.

3.1.8 The consultation document (para 5.11) further mentions that "*the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs, following a request from the neighbouring authority".* Again, the strategic objectives are silent on this matter, and it must be clarified whether the Council intends the Plan to help address this need, as a matter which highly formative to the distribution of growth and selection of housing sites.

3.2 SUMMARY

3.2.1 The strategic objectives as currently drafted do not provide a "Sound" basis to inform the development strategy, site selection or future planning policies. They fail to set out the amount of development that is to be planned for. This is fundamental to informing the spatial strategy and policy making, especially in respect of setting strategic policies (NPPF, para 20). The objectives must therefore either be expanded or a new objective added which sets out that the Plan seeks to deliver its full objectively assessed need as a minimum (NPPF, para 11b). The proposed brownfield sites must be allocated, and the Council should take a proactive approach including identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs on brownfield sites. Urban regeneration will not meet the objectively assessed need on its own. Therefore, it is also acknowledged that there will need to be development through other development options for the Council to deliver the housing need.

4 DEVELOPING A SPATIAL STRATEGY

4.1 DEVELOPMENT NEEDS

4.1.1 The consultation document (para 5.3) sets out the development needs of Medway, identifying a current housing need of 1,667 homes per annum (pa) or circa 28,500 over the Plan period (2022-2040). Para 5.4 casts doubt about whether this is an appropriate figure. However, it is considered essential that the Plan seeks to deliver development that meets Medway's objectively assessed need in full.

4.1.2 As evidenced in Table 3.1 below, the Council has consistently failed to deliver against its housing requirement since 1986, with the requirement only met back in 2008/09 and 2009/10. This, evidently, has led to the current acute shortage of housing in Medway and current identified need. During this time, the need for affordable housing has also become even more acute, with an identified annual need for 870 affordable homes pa (Medway Local Housing Needs Assessment, October 2021, prepared by Arc4).

4.1.3 The growing need for both market and affordable housing lends emphasis to the requirement for the Council to plan to meet its full objectively assessed need, as required by the NPPF (para 11b and para 23), supporting the Government's objectives to significant boost the supply of homes (NPPF, para 60).

Summary of Historic Housing Delivery in Medway			
Year	**Completions**	**Requirement (at that time)**	**Difference**
1986/87	1,118	1160	-42
1987/88	821	1160	-339
1988/89	1,454	1160	294
1989/90	1,467	1160	307
1990/91	391	1160	-769
1991/92	825	900	-75
1992/93	769	900	-131
1993/94	669	900	-231
1994/95	546	900	-354
1995/96	644	900	-256
1996/97	598	900	-302
1997/98	702	900	-198
1998/99	698	900	-202
1999/20	719	900	-181
2000/01	603	700	-97
2001/02	603	700	-97
2002/03	676	700	-24

2003/04	733	700	+33
2004/05	646	700	-54
2005/06	562	700	-138
2006/07	591	815	-224
2007/08	761	815	-54
2008/09	914	815	99
2009/10	972	815	157
2010/11	657	815	-158
2011/12	809	815	-6
2012/13	556	815	-259
2013/14	579	1000	-421
2014/15	483	1,000	-517
2015/16	553	1,000	-447
2016/17	642	1,000	-358
2017/18	680	1,334	-654
2018/19	647	1,683	-1,036
2019/20	1,130	1,662	-532
2020/21	1,087	1,586	-504
2021/22	1,102	1,657	-573
1986/87-2021/22	**27,407**	**35,727**	**-8,320**

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

4.1.4 The Consultation document (para 5.11) notes Medway Council must consider if it can take 2,000 homes to assist Gravesham Borough Council in meeting its housing need. Therefore, it is even more pressing that the Council plans to meet its housing objective in full, since this could contribute to a worsening housing supply and affordability, if there is consistent under delivery of housing in this part of Kent (if Gravesham does not meet its needs). Medway Council should therefore work with Gravesham Borough Council to determine if it needs to and/or can accommodate any of its needs, to ensure the Plan is "Positively Prepared" (NPPF, para 35).

4.1.5 As a minimum, the objective to meet the objectively assessed need in full is supported, as required by National policy, with the Council to explore further whether it also needs to plan to meet any needs arising from Gravesham Borough Council or any other Council's (as appropriate) i.e., Tonbridge & Malling, which also boarders Medway.

4.2 HOUSING SUPPLY

4.2.1 Paragraph 5.3 of the consultation document sets out the need for 1,667 homes pa, equivalent to 28,312 homes up to 2040 (circa 28,500 homes). The below section reviews the potential pipeline supply of sites, with reference to the Land Availability Assessment (LAA), Interim Report, September 2023. Considering the supply of sites and their relative suitability and deliverability are highly relevant to the spatial strategy and potential preferred approach, which are considered in Section 5.

Pipeline Development

4.2.2 A pipeline supply of sites with planning permission for 7,583 homes, of which 2,061 homes are under construction as of 31 March 2023, is identified.

4.2.3 Based on the level of information available, it is difficult to determine with any level of certainty whether the purported supply is reliable. However, we have concerns over double counting on several of the sites shown in Appendix C and D of the LAA around Strood waterfront, the urban edge of Strood North and Finsbury, Cliff Woods and Rainham as several of the sites identified in Appendix D have been delivering homes before the start of the identified plan period in 2022. The Council should make it clear through its future evidence base how units delivered before 2022 have not been counted towards the overall supply.

4.2.4 Furthermore, it cannot be assumed that each one of these sites will come forward or come forward in full. For instance, consents can lapse, or the full development potential of a site may not be achieved. Forexample, reserved matters consent is granted for fewer homes than consented under an Outline permission. Based on previous delivery rates, a discount rate must therefore be applied, allowing for an element of under-implementation. As such the full 7,583 homes cannot be relied upon as part of the spatial strategy.

Windfall Supply

4.2.5 Windfall development is defined at Annex 2 of the NPPF as sites not specifically identified in the Development Plan.

4.2.6 The NPPF (para 71) sets out that:

> *Where an allowance is to be made for windfall sites as part of anticipated supply, there should* ***be compelling evidence that they will provide a reliable source of supply****. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. (****Our emphasis****)*

4.2.7 The consultation document sets out that 3,000 homes will be delivered from windfall sites. The Council has published a Housing Delivery Test (HDT) Action Plan (July 2022) as it has not met the requirements of the HDT 2021. This action plan identifies the delivery of large/windfall dwellings which on average since 2012 have delivered 919 dwellings pa. This provides data on the historic delivery of windfall sites in Medway.

4.2.8 As acknowledged in the NPPF (para 71), the Council can refer to historic windfall delivery. However, this must be considered in the context that the Council has not had an up-to-date Local Plan for 20 years. Therefore, the majority of sites that have delivered housing are considered windfall sites. This significantly distorts the windfall delivery rate.

4.2.9 Whilst the data provided in the HDT Action Plan (July 2022) may on the face of it provides the justification for a higher windfall rate, it is unclear as to how exactly the Council has arrived at a figure of 3,000 without an appropriate methodology being published. Through our experience, we are also aware that historically a high proportion of homes have come forward on brownfield windfall sites. The supply of such sites is not exhaustive, and it is noted that a significant number of brownfield sites are also identified in the "Urban Regeneration" spatial strategy. There is, therefore, a high potential for double counting (brownfield sites propping up windfall supply but are then also allocated).

4.2.10 The 3,000 dwellings given over to the windfall allowance therefore seem optimistically high, especially where this does not count towards the first five years of the supply. In the absence of any detailed evidence, it is considered that the Council does not have a compelling case to rely on the delivery of 3,000 homes. The windfall supply through the Plan period should therefore be reduced.

Potential Allocations

4.2.11 The LAA identifies 447 sites across Medway that have the potential to supply 38,216 homes. This is above the housing requirement of the 28,312 homes (+ 9,904 homes). The sites can be broken down into four distinctive categories, which form the different spatial strategy options as follows:

- Urban regeneration;
- Suburban growth;
- Rural development; and
- Green Belt loss.

4.2.12 The remainder of this section analyses the capacity of each category for potential housing delivery identified in the LLA.

Urban Regeneration Sites

4.2.13 Map one of the consultation documents provides an overview of the potential sites for urban regeneration across Strood, Chatham and Rochester encompassing small medium and large sites. The urban regeneration sites make up the second largest element of the potential supply, with the potential to deliver 11,151 homes.

4.2.14 We have significant concerns regarding the reliability of some of this proposed supply on the basis:

- The development potential of many of the sites has been known about for some time, but they have failed to come forward, including within more economically buoyant times, because of issues of viability or technical constraints;

- The Peel Ports site is known to have complex landownership/leasehold constraints. This is without addressing any individual site constraints such as contamination and whether redevelopment of the Site is financially feasible. There are therefore significant concerns over its delivery which cannot be relied upon;

- The requirement to provide BNG is likely to be a significant constraint to brownfield sites coming forward. Whilst on the face of it, many of these sites might seem ecologically sparse, they often harbour more interesting habitats, which under the DEFRA Metric 4 trading rules are very difficult to replace elsewhere. Brownfield sites are also likely to wholly rely on off-site BNG provision. This is likely to impact viability (contributions for off-site provision are very high) or significantly reduce the development potential of some sites.

4.2.15 With the above in mind, it is considered a conservative estimate that circa 3,500 dwellings of the sites within the urban regeneration category may not be deliverable in the proposed Plan period and based on the previous urban regeneration delivery rates.

4.2.16 However, urban regeneration allocation is still considered intrinsic for Medway to meet is housing need as they provide sustainable locations for residential and mix-use communities in the heart of the Medway Towns.

4.2.17 Given Medway's constraints to development in urban areas including on brownfield, it is increasingly important that Medway maximise the delivery of long-

standing allocations on brownfield land within the special those that are currently allocated but not yet built out.

4.2.18 It is acknowledged that the delivery rates of brownfield sites are slower than Greenfield sites so it is anticipated that many of the larger urban regeneration sites may not start delivering the units required until after the first 5 years of the plan period. Thus, there still need to be consideration of other strategic development options.

Suburban growth

4.2.19 Map two of the consultation document provides an overview of potential sites for Suburban Growth, with the potential to supply 9,680 homes. Several sites within this category are not considered suitable, such as:

- In Capstone and Darland in areas of local landscape importance/sensitivity adjacent to or in the Country Park or being sites of special nature conservation/local nature reserves;

- Sites on the southern boundary of Medway's administrative area with Maidstone Borough Council due long-standing concerns regarding deliverability due to issues of access and landownership, resulting in lapsed consents; and

4.2.20 Taking the above into account, it is considered at least 3,123 homes can be discounted from the potential supply of housing. Therefore, it is essential that Medway maximise the development potential of other strategic development options to help deliver the housing supply needed on the most sustainable sites.

Rural Development

4.2.21 The consultation document sets out through the LAA that potentially 14,736 homes in the rural development strategy could come forward. The majority of the rural housing sites are on the Hoo Peninsula centred around the settlements of Chatterden, Cliffe, Cliffe Woods, Allhallows, Hoo St Werburgh High Hailstow, Lower Stoke and the Isle of Grain.

4.2.22 This is the single potential largest supply of housing. The following concerns are raised regarding many of the sites.

- The sites identified around the settlements of Allhallows, the Isle of Grain and Lower Stoke are within the periphery of Medway's administrative area with limited access to sustainable modes of transport and every-day services to meet the needs of the existing and future residents of the settlement. Many of the sites proposed for development in these areas are

large and propose a scale of development that is either disproportionate to the settlement and/or is unsustainably located with regard to the Council's strategic objectives;

- The peripheral sites around the northern edge of Cliffe Woods do not form logical extensions to the settlement in this Plan period given the existing pipeline of development to the south, west and northwest of the settlement that have either been granted planning permission or have live planning applications submitted to the Council;

- Development whether it be for future employment, residential or mixed-use development on the Hoo Peninsula is reliant on the existing road network. Medway Council lost its Housing Infrastructure Funding (HIF) of £170 million in July 2023 to deliver the expansion of Hoo. In a statement on 11 July 2023 Medway Council stated that:

  "The loss of HIF today means we cannot fund and deliver the long needed all-important roads, public transport and environmental improvements ahead of new homes being built on the Hoo Peninsula."

  Consequently, the loss of HIF funding puts into question the sustainability and deliverability of the sites in and around Hoo. Whilst there is a scale of development interest here, amongst relatively few landholders which could secure the delivery of a significant proportion of growth, the infrastructure upgrades required to deliver that development will have to be developer funded. This will require close collaboration across a consortium of landowners and developers to secure this. The commercial realities of this are that this will require significant commercial agreements across all parties to secure infrastructure delivery likely including the need for equalisation agreements. This additional layer of complexity, notwithstanding the infrastructure constraints significantly reduces the ability of any development in Hoo to form a reliable part of the Council's housing land supply and therefore cannot be relied upon.

- Allied to the above, in the absence of infrastructure upgrades onto the peninsula, this further undermines the delivery of any expansion to the settlements at Lower Stoke, Allhallows and the Isle of Grain, which rely on the same infrastructure upgrades.

4.2.23 It is not fully known how development on the Hoo Peninsula will be impacted by the loss of the HIF funding. However, given the outlying nature of some of the other rural settlements on the peninsula such as Cliffe, Allhallows, Lower Stoke and the Isle of Grain a conservative estimate suggests a loss of a minimum of 3,327 homes from the potential supply before discounting of sites from the Hoo expansion (previously identified in the Hoo development framework).

Green Belt Loss

4.2.24 Just under 5% of land in Medway is designated as Green Belt. The areas of Green Belt form part of the London Metropolitan Green Belt and join land adjacent to Gravesham Borough Council and Tonbridge and Malling Borough Council. The Green Belt in Medway provides the strategic gap between Strood and Higham and between Snodland and Halling. The Council has identified the changing characteristics of the Green Belt due to the context of major infrastructure investment (the lower Thames crossing) as an opportunity for a limited number of homes in proximity to transport networks and services in Strood to be developed in the Green Belt providing new services as well as homes.

4.2.25 Where a site for potential Green Belt release conflicts with the five purposes of the Green Belt, the site has been discounted from the supply although its contribution is limited.

4.3 SUMMARY

4.3.1 Overall, having reviewed the 447 sites identified in the LAA Stage 1 assessment, it is considered that from a potential supply of 38,216 homes, optimistically only 27,674 could be deliverable (See table 4.1 below). This is having regard to part delivery rates, known planning and infrastructure constraints, as well as considering whether the board location and scale of development proposed are suitable given the location of the sites. Due to the high-level nature of LAA, a finer grain assessment of the suitability of the sites could not be undertaken. However, our assessment demonstrates that the potential supply as set out at para 5.16 cannot all be relied upon.

Category	Medway Potential Housing Capacity (From LAA)	DHA's view on Potential Housing Capacity (from LAA)	Difference in Supply
Urban Regeneration	11,151	7,651	3,500
Suburban Growth	9,680	6,157	3,123
Rural Development	14,736	11,229	3,147
Green Belt Loss	2,649	2,637	12
Total potential supply	**38,216**	**27,674**	**10,182**

4.3.2 In addition, the windfall site allowance, at para 5.15 and Table 3.1, is optimistically high, and it does not accurately reflect likely windfall provision going forward, taking into account the adoption of the Local Plan, allocation of new sites and other constraints to housing numbers such as BNG.

5 SITE – CHATHAM INTERFACE SITES REFS CCB 25 AND CCB 35

5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

The Opportunity

5.1.1 Sites CCB 25 and CCB 35 are known respectively as the Riverside and Brunel sites and are located within the currently designated Chatham Maritime regeneration area as defined by the local plan 2003. Therefore, they are deemed suitable sites in principle for urban regeneration that should continue to be allocated within the emerging local plan. The two sites are supported by the current Chatham Interface Land Development Brief (June 2018), which supports the redevelopment of the sites for residential lead opportunities while supporting mixed uses.

5.1.2 The opportunity to continue the allocation of sites CCB 25 and CCB 35 aligns with paragraph 5.19 of the consultation document which states that "the new local plan will draw on existing policy strategies and programs that promote the regeneration of Medway's urban centres and waterfront." The continued allocation would help secure the underutilised brownfield site for redevelopment through the local plan.

5.1.3 The Council acknowledge that the sites have the potential to create a new benchmark for future place-making and residential led mixed use development, providing a key part in the success of Medway's future growth.

5.1.4 The sites have previously been submitted for pre-application discussions with the Council for circa 250 homes as part of a regeneration strategy. The sub section below identifies the opportunities for the quantum of development on the site.

Site CCB35 Brunel Site

5.1.5 The site comprises 2.44ha of land within the Chatham Historic Dockyard Conservation Area. The site is located west of Dock Road and south of The Observatory office premises and Travelodge Hotel. A nursery facility lies outside but adjacent to the site in the east sharing the access to the site off Brunel Way.

5.1.6 The site has potential capacity for 100 units comprising apartments and houses taking into account heritage and flood risk constraints. To maintain the number of homes across the site apartment, buildings are to be provided outside the flood zone to achieve accommodation on the ground floor.

Site CCB25 Riverside Site

5.1.7 The site comprises 2.56ha of land. The site lies to the west of Main Gate Road (the main access to the Historic Dockyard) and south of Leviathan Way, overlooking the river Medway. The site also lies within the Chatham Historic Dockyard Conservation Area. The site is cleared of any buildings, but hardstanding and self-seeded grassed areas remain.

5.1.8 Indicative design work has shown the site has capacity the opportunity for up to 151 units comprising mainly apartments with a limited number of houses and commercial uses at ground floor level which are less vulnerable to flooding.

Combined Site Potential

5.1.9 The two sites therefore have the potential to:

- Delivering mixed-use redevelopment within a core regeneration area where the principle of development has previously been established and the consultation documents seeks to retain the allocations.
- Progressing appropriate proposals for a total of up to circa 250 units at 3 stories in height based on the highest quality design approaches;
- Ground floor commercial units;
- Realise the place making potential of the sites enhancing the heritage of the site, its setting and their setting, providing additional tree lining, public open space;
- Providing development that corresponds to the wider area including the slipways and the mast pond;
- Integrating surrounding complementary land uses and good road, rail and sustainable transport connections by strengthening linkages to and through the site via a high-quality public realm ensuring footpath, cycle, and river connectivity.

5.1.10 In doing, the above the sites can deliver an attractive environment for end users, enhancing fulfilling Medway's regeneration and placemaking aspirations whilst helping meet housing needs.

5.2 OTHER CONSIDERATIONS

Public Rights of Way

5.2.1 There are no known Public Rights of Way that affect the sites.

Flood Risk

5.2.2 Both sites are at tidal risk of flood from the river Medway and are at high risk of flooding. Mitigation measures such as the height of ground floor levels and no habitable living accommodation have been considered in the initial indicative design approaches. This can also be specified in any Strategic Planning Policy that looks to Allocate the sites for residential led mix use development in the emerging Local Plan.

Contamination

5.2.3 The sites are brownfield sites that have been cleared of buildings. Any necessary contamination assessments and appropriate mitigation measures can be put in place if the sites were to come forward for development. Heritage Assets

5.2.4 The sites lie within the Chatham Historic Dockyard Conservation Area. There are a number of Grade II, Grade II*, Grade I and scheduled ancient monuments within the settings of the site. The assets of Particular importance for each site are set out below are:

- The Brunel site:
    - Police House (sometimes referred to as the Police Section or Section House). The building is both a Scheduled Monument and Grade II listed.
    - The Brunel Sawmill building, and the site contains part of the canal tunnel which was used for floating timber from the South Mast Pond to the sawmill.
    - The Sawmill and below ground canal tunnel are both Scheduled Monuments and Listed.
    - Saw pits; and
    - Wall remains.
- The Riverside Site:

- the original 18th-century dockyard;
- lowermost house, number eight slip and public house this;
- converted slip buildings;
- slipway;
- mast Pond

5.2.5 It is acknowledged that the design layout and massing of any development on the site should take account for the character of conservation area and should achieve a high-quality design that will preserve enhance the area's historic and architectural character appearance and importance that is largely dictated by the listed buildings and scheduled ancient monuments identified above.

Archaeology

5.2.6 it is understood that given the nature of the heritage assets and skate scheduled ancient monuments on or within close proximity to the site that there is a possibility that those nationally important archaeology present within the site cannot be ruled out that may be required to remain in situ. Therefore, the archaeology of the site will be essential to understand how the site may come forward for residential-led urban regeneration.

Biodiversity Net Gain

5.2.7 Whilst on the face of it the Chatham Interface may appear ecologically sparse, it is understood that there are some habitats of importance, which under the DEFRA Metric 4 trading rules are very difficult to replace elsewhere. This is likely to impact the viability of providing affordable housing provision on the site or off-site developer contribution to the Council etc.

Deliverability, Availability and Suitability

5.2.8 For sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

5.2.9 Availability is essentially about confirming that it is financially viable to develop, and viability remains a central consideration throughout plan making. The two sites are currently allocated for residential-led mixed-use development in the adopted Local Plan (2003) with Countryside Partnerships having an option agreement to develop the sites.

5.2.10 The site has a current development brief. This should be updated through the emerging Local Plan as a method that seeks to advise on issues such as BNG as well as heritage moving forwards to address concerns over the feasibility and viability of the sites moving forward.

5.2.11 Given the nature of the site and its availability it is considered that the circa 250 dwellings and commercial space would start to be delivered after the first 5 years of the plan.

Suitability

5.2.12 For reasons set out in this the representation sites are considered a suitable and sustainable location for development providing brownfield sites to deliver housing need.

5.2.13 Residential development on this site would make an important contribution to the required housing supply for the plan period for Medway given that it needs to meet the needs of Gravesham Borough Council and the deliverability issues of delivering the 5,000 homes that would be part of the Hoo development framework and sustainability concerns over other rural development sites in Medway.

Achievability

5.2.14 The achievability of the sites is reliant upon an understanding of the archaeology at the site and agreement with statutory consultees on an agreed approach to develop the site. It is noted that BNG is an issue on the site and solutions are being sought to resolve this issue currently.

5.2.15 With the concerns over the delivery of rural development sites at Cliffe Woods within this plan period and the delivery of the expansion of Hoo set out in previous sections of this representation it puts into question the sustainability and deliverability of the sites in and around Hoo.

5.2.16 Whilst there is a scale of development interest here, amongst relatively few landholders which could secure the delivery of a significant proportion of growth, the infrastructure upgrades required to deliver that development will have to be developer funded. This will require close collaboration across a consortium of landowners and developers to secure this. The commercial realities of this are that this will require significant commercial agreements across all parties to secure infrastructure delivery likely including the need for equalisation agreements. This additional layer of complexity, notwithstanding the infrastructure constraints significantly reduces the ability of any development in Hoo to form a reliable part of the Council's housing land supply and therefore cannot be relied upon.

5.2.17 Allied to the above, in the absence of infrastructure upgrades onto the peninsula, this further undermines the delivery of any expansion to the settlements at Lower Stoke, Allhallows and the Isle of Grain, which rely on the same infrastructure upgrades.

5.2.18 It is not fully known how development on the Hoo Peninsula will be impacted by the loss of the HIF funding. However, given the outlying nature of some of the other rural settlements on the peninsula such as Cliffe, Allhallows, Lower Stoke and the Isle of Grain a conservative estimate suggests a loss of a minimum of 3,327 homes from the potential supply before discounting of sites from the Hoo expansion (previously identified in the Hoo development framework).

5.2.19 Therefore, it is evident that additional housing needs will be required to be provided in the other 3 spatial options including through urban regeneration strategies. Therefore, the redevelopment of the Chatham Interface sites would provide opportunity to maintain an existing allocation for residential lead development that is achievable over the next plan period that will make an important contribution in meeting Medway's housing needs.

5.3 SUMMARY

5.3.1 The sites CCB25 and CCB35 are promoted through these representations as an existing brownfield allocation site which should be retained in the next local plan as they are achievable, suitable and deliverable for residential led development. It would make the most effective use of land in accordance with paragraph 119 of the NPPF and boost the supply of homes in accordance with paragraph 60 of the NPPF.

6 PREFERRED SPATIAL STRATEGY

6.1 PREFFERED SPATIAL STRATEGY

6.1.1 As is evident from Table 1 of the consultation document that no single development scenario supplies enough homes to meet the objectively assessed need. The consultation document is therefore misleading in asking for comments on a preferred development option (suggesting there is only one option for growth), when a combination of all the options is likely to be required. However, having regard to the Sites at Section 5, the preferred development option is "a mixed approach of the 4 residential development options" allowing for urban regeneration sites to deliver sustainable communities. In identifying our preferred option, we have also considered the pros and cons of the other development options.

Option 1 - Urban Regeneration

6.1.2 This focuses on urban sites within Chatham, Strood and Rochester in and around the individual towns, high streets or on the waterfront of the river Medway.

6.1.3 For the reasons section under section 4, There are concerns raised regarding the deliverability of some of these sites. The availability and deliverability scenarios around brownfield are generally complex. Given delivery rates it is understood that such sites would make up a significant component of the housing land supply, after the first 5 years of the Local plan being adopted because of the complexities involved with such sites coming forward.

Option 2 - Suburban Expansion

6.1.4 This focuses on land around Gillingham, Rainham and the south of the administrative area in Capstone. Whilst we have raised concerns about several of the sites within this category coming forward, this is an essential part of Medway's development strategy.

6.1.5 Since these sites are greenfield sites and therefore most likely to be deliverable within the first 5 years of the plan period. In general terms, Greenfield sites have less complex deliverability, availability, and consideration due to their current use. These sites along with brownfield sites can secure community benefits and infrastructure, including much-needed affordable housing, but are considered to be less constrained by issues of viability, such as sites under Option 1.

Option 3 - Rural Development

6.1.6 Focuses development to the north of the administrative area on the Hoo Peninsula. For the reasons identified under Section 4. There are significant concerns over the deliverability and reliability of substantial development coming forward under this spatial option. Whilst it might be suitable allocated smaller sites to meet local housing needs, this spatial strategy cannot be relied upon to deliver the housing numbers purported in Table 1 of the consultation document. Thus, the dwellings proposed here need to be re-distributed through Options 1 and 2 preferably brownfield / previously developed sites to make the most effective use of land as set out by paragraph 119 of the framework to meet housing needs.

Option 4 - Green Belt Release

6.1.7 These are shown as sites adjacent to the administrative areas of Gravesham Borough Council that are adjacent to the settlement of Strood and in the strategic gap between Halling (Medway Council) and Snodland (Tonbridge and Malling Borough Council) adjacent to where each neighbouring Council is proposing urban extension or standalone new settlements to meet their housing need.

6.1.8 Medway's Green Belt represents 5% of the administrative area. Whilst the need for Green Belt release only forms part of the potential supply it should not be relied upon to fully meet the housing need. Therefore, Option 4 should be part of a rounded approach from Medway to deliver decent housing in sustainable locations to meet the needs of its population.

6.2 SUMMARY

6.2.1 To meet the identified housing requirement in full, housing will need to be allocated drawing on several of the four options for development rather than an individual strategy. It is considered that Option 3 Rural Development need to be relied upon less due to deliverability concerns of the development of the 5,000 dwellings that were part of the Hoo development framework due to the loss of HIF funding. Aligned with this are sustainability concerns around some of the smaller rural settlements on the Hoo peninsula. The Green Belt is limited in Medway So can only take a small portion of the development. Therefore, urban regeneration sites and suburban growth need to take more of the burden for meeting the Council's housing and employment needs.

7 OTHER COMMENTS ON THE LAND AVAILABILITY ASSESSMENT

7.1.1 Appendix F identifies sites that are of 'unknown availability' Both Chatham Interface Sites are identified on this map (**Site Refs CCB25 and CCB35**). It is not fully known how or why the Council have put the sites on this map given that the sites are an adopted allocation in the Local Plan (2003) and from the understanding of paragraph 5.19 of the consultation document the Council will be seeking to continue the allocation of site on the waterfront of the River Medway in Chatham. Both sites are considered suitable, available, and deliverable urban regeneration sites within the Plan period 2022-2040.

8 CONCLUSIONS

8.1.1 The overall Vision for Medway partly accords with Paragraph 15 of the NPPF setting out the economic, social and environmental priorities for the Local Plan to facilitate Medway becoming a leading regional city. However, the vision is silent on the requirement of Paragraph 15 to require up-to-date plan to provide a framework for addressing housing need. Delivering homes and new neighbourhood and communities underpins economic investment, social and environmental priorities as it is a catalyst for place making which is at the heart of Medway's vision to become a leading regional city.

8.1.2 To support a vision that includes a framework to deliver housing to meet local needs it is essential to have a strategic objective to support the delivery of homes, the need for housing as it is the underlying catalyst from clearing the sustainable, resilient and economically driven aspiration for Medway to become a leading regional city. Therefore, a fifth objective is required within the emerging Local Plan at regulation 19 stage of development to address housing need in Medway to deliver the vision of the Local Plan.

8.1.3 The LAA assessment considers 447 sites across the four residential development options to deliver the 28,312 homes (+ 9,904 homes) homes across the plan period there are concerns over the deliverability of sites across all the options proposed in the consultation document due to deliverability concerns over the loss of HIF funding and the sustainability of sites in rural development areas, the location of sites within sites of landscape sensitivity/importance and country parks along with potential viability concerns over the deliverability sites due to due to the cost of remediation measures and the impact of mandatory BNG from January 2024 for major development sites and several sites deliverability being challenged due to the age/ number of lapsed consents on the site.

8.1.4 Having analysed the 447 it is a conservative estimate that 10,182 homes can be removed from the potential Housing Supply for the plan period before the Council have discounted any sites at Stage 2 and 3 of the LAA due to concerns over deliverability and availability of the sites.

8.1.5 The Chatham Interface sites (**Ref CCB25 and CCB35**) are identified within the Stage 1 LAA and can deliver circa 250 residential units and commercial units to meet Medway Council's needs in a sustainable and suitable location capable of meeting the shortfalls identified from Option 3 Rural development from the Loss of HIF funding in the Mid to latter stages of the plan period extending to another planning period.

8.1.6 Therefore, the two sites should remain as residential-led housing allocation within the emerging Local Plan as hinted at in paragraph 5.19 of the Consultation Document.